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The Commonwealth of Massachusetts Executive Office of Health and Human Services Department of Public Health

Department of Mental Health
Department of Mental Retardation

Medication Administration Program

MAP Policy Manual

Department of Public Health Department of Mental Health Department of Mental Retardation

Medication Administration Program Policy Manual September 1, 1998

The Departments of Public Health, Mental Health and Mental Retardation have compiled all existing Medication Administration Program advisories and policies into one comprehensive document, the MAP Policy Manual. The policies in this Manual, some of which are revisions of existing policies, supercede all other policies on these topics previously issued by the Departments.

In addition, the Manual incorporates several new policies, including:

- Transcription of Health Care Provider's Orders
- Monitoring of Vital Signs
- Exhausting Current Supply of Medication
- Blood Glucose Monitoring
- Administration of Epinephrine via Autoinjector
- Over-the-Counter Medications

The MAP Policy Manual is intended to provide service providers, trainers, staff and other interested parties with a single, topically organized source for MAP policies. Sources of policies as well as dates of issue and revision are provided. In the future, new policies will be issued as additions to the Manual in order to facilitate ready access to the information.

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01

SITE REGISTRATION

POLICY ISSUE: Criteria for Registration POLICY NO: 01-1

POLICY SOURCE: April 1997 MAP Advisory DATE ISSUED: 4/97

Supervisor's Training Manual DATE ISSUED: 05/15/98

Site Registration

- MAP DPH regulations are intended to address the needs of clients/consumers who are living in DMH/DMR licensed funded, or operated community residential programs that are their primary residences and/or are participating in day programs and short-term respite programs caring for stable individuals. These community residential programs, day programs, and short-term respite programs may register with DPH for the purpose of authorizing employees to administer or assist in the administration of medications (105 CMR 700.000 and 105 CMR 700.004(C)(1)(i)). Long -term (generally greater than thirty days) respite programs, crisis intervention centers or programs, hospital diversion units or centers, residential treatment centers and other similar programs are not eligible for registration with DPH and therefore, cannot utilize certified staff for medication administration.
- All sites meeting the above definition of a community residential program, day program and short-term respite program and who store medication on site must be registered with DPH. This includes those sites where only licensed staff administer medications. Registering the vendor or service provider does not satisfy the DPH requirements for registration.
- All sites are registered under the corporate name (name of the service provider) not the program, e.g. registered as Berkshire Family Center, not Dudley House..
- It is the address of the site that is registered with DPH, not the program.
- DPH registers the geographic site where the medication is stored. This means that if there is a three family house with three staffed apartments (one on each floor) and all three apartments store medications, then all three apartments must register individually. DPH issues three registrations, one for each apartment, not one registration covering the entire house.
- If a site closes, the site is required to return its registration (MCSR) to DPH with a written letter stating that the site closed and the date of closure.

- If a registered site plans to relocate, the site is required to return its registration (MCSR) to DPH with a written letter stating the change of address prior to the move. The letter should include the date the new site will open and the date that the old site will close. DPH will make the necessary changes and issue an updated registration (MCSR) for the new location.
- DPH must be notified as soon as possible when a program either changes its name and/or is taken over by another service provider, corporation or vendor. Please remember to include the site's address and registration in the correspondence.
- The Massachusetts Controlled Substance Registration (MCSR), also known as the DPH registration number, must be kept at the site with a copy of the MCSR kept at the service provider's or vendor's administrative office.
- Staff will need the MCSR number in order to complete a Medication Occurrence Report. This
 number (MAP plus five (5) digits) is recorded in the section of the MOR that requests the
 "DPH registration number". In addition, you will need the MCSR number when you call DPH
 for information. The MSCR number should be included in all correspondence whenever
 possible.
- Registration is valid for only one year. Renewal forms will need to be submitted to DPH approximately one month before the registration expires. The application or renewal process should take approximately four (4) to six (6) weeks. If you do not receive your registration within eight (8) weeks, please contact DPH at (617) 983-6780.
- Unless requested otherwise, the renewal applications and registrations are mailed to the corporate address not the site address. Therefore, sites should call the corporate office for their registration.
- The Massachusetts Controlled Substance Registration (MCSR) issued to a site must be returned to DPH if: 1) a registered site no longer houses DMH/DMR clients/consumers; 2) the clients/consumers are all self-medicating; or 3) medications are no longer stored at that site. MCSRs are not transferable.

POLICY ISSUE: Categories of Programs Needing POLICY NO: 01-2

to Register

POLICY SOURCE: 1994 DMR Memo DATE ISSUED: 11/18/94

RE: Categories of programs needing to participate in medication administration certification process

Many questions have arisen regarding the kinds of programs responsible for certifying staff to administer medications. After consultation with our legal department, we are able to clarify this matter. Below is a response to each type of program in which questions have arisen:

- 1. Day programs Any site-based day program which administers medication is required to have certified staff.
- 2. Personal Care Attendant arrangements in which the individual or surrogate hires the P.C.A. The P.C.A. does not need to be certified to administer medication.
- 3. Specialized Home Care Providers Under G.L.C.-112 Sec. 80B, a person employed primarily as a companion, housekeeper, domestic servant or nursemaid and is not licensed as a medical professional may administer medication. In addition, G.L.C. 94C Sec 1 indicates that a member of a household may possess controlled substances. Specialized home care providers fall within these exceptions and do not need to be certified to administer medications. However, providers are encouraged to send providers to the training for their own knowledge.
- 4. Respite care providers
 - a) Facility-based must be certified to administer medication.
 - (b) Non-facility based does not need to be certified, under point 3. This applies to respite care providers hired by the family directly, or mediated through an agency. Agencies may set up procedures which indicate that the family is sharing the responsibility for medication administration with the support staff much like a surrogate directs a P.C.A. to carry out such duties. Also, an agency and/or a family is encouraged to send respite providers to training.

POLICY ISSUE: Site Registration POLICY NO: 01-3

POLICY SOURCE: DPH Form DATE ISSUED:

DATE REVISED: 10/06/97

SEE FORMS ON FOLLOWING PAGES

COMMONWEALTH OF MASSACHUSETTS APPLICATION FOR CONTROLLED SUBSTANCES REGISTRATION

Administration of Medications in Community Programs INSTRUCTION SHEET

A separate application must be submitted for each site seeking registration. All sections must be completed in their entirety or your application will be returned.

- 1. <u>Service Provider Name, Address and Telephone Number</u> Provide the official corporate name and address of the service provider, the telephone number and the mailing address if different.
- 2. <u>Site Address and Telephone Number</u> Provide the address of the individual site being registered, the site telephone number and the mailing address if different.
- 3. <u>Site Supervisor</u> Provide the name of the individual responsible for supervising direct care staff at the site being registered.
- 4. **Type of Application** Indicate whether the application is new or is a renewal.
- 5. **Renewal** If a renewal, enter the current DPH registration number (Also known as the MCSR number).
- 6. <u>Licensing or Certification</u> Indicate which agency is responsible for the licensure or the certification of the site being registered. Indicate if it is a State Operated site. Complete the site's current DMH license number if appropriate. Indicate if the site is DMR certified. List additional licenses or certifications pertinent to the site. Please submit a copy of all current site certification(s) and/or license(s).
- 7. <u>Type of Site</u> Indicate by checking the appropriate box which type of site is being registered. Please note that short-term respite is interpreted as generally thirty (30) days or less and provides care for **stable** individuals.
- 8. Capacity of Site State the maximum number of consumers that your site provides care for.
- 9. **Population(s) Served** Indicate which age group(s) are served by the site being registered.
- 10. **Statement Section** Applicant must respond "yes" or "no" to all statements. For any statement checked "no", provide an explanation on a separate attachment.
- 11. .Signature The signature must be completed, including signature of the authorized individual, date, and printed name and title.

To receive a Massachusetts Controlled Substance Registration:

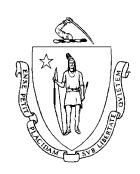
- 1. Complete all pages of the application.
- 2. Mail to: DEPARTMENT OF PUBLIC HEALTH

Division of Food and Drugs

305 South Street

Jamaica Plain, MA 02130

ATTN: MEDICATION ADMINISTRATION PROGRAM



MASSACHUSETTS DEPARTMENT OF PUBLIC HEALTH DIVISION OF FOOD AND DRUGS 305 SOUTH STREET, JAMAICA PLAIN, MA 02130 (617) 983-6700

APPLICATION FOR CONTROLLED SUBSTANCES REGISTRATION

Administration of Medications within a Community Program

(in accordance with regulations of the Department of Public Health at 105 CMR 700.000)

(III decordance with	regulations of the De	partment of 1 ubile freat	tii at 105 CNIK /00.000)			
1. Name of Service Provider:						
Address:						
riddiess.						
Street	City/To		Zip Code			
Mailing Address:	City/10	****	Telephone #:			
Training receivess.			()			
Street	City/Town	Zip Code				
2. Site Address:	City, 10 Wil					
2. Site Fladress.						
Street	City/To	wn	Zip Code			
	ONJ, 10	,,,,,,	Zip code			
Site Mailing Address:			SiteTelephone #:			
			()			
Street	City/Town	Zip Code				
3. Site Supervisor:		T				
4. APPLICATION TYPE:						
	RENEWAL					
5. If renewal , current Massach	usetts Controlled Substa	nce Registration (DPH Re	gistration) #:			
MAP						
6. LICENSING/CERTIFICAT	ION:					
DMH DMR OTHER State Operated YES NO						
<u> </u>						
DMH License # DMR Certification			□ NO □			
Additional Licenses and/or Certifications:						
Types:		License/Certificate #(s				
Please submit a copy of your	license(s) or certificat	e(s) with this application	1.			

7. TYPE of SITE: (Check those that apply.)				
Individual Apartment				
8. CAPACITY of SITE:				
Maximum Capacity				
9. POPULATION(S): Please check all that apply.				
Adults (18 years of age or older)				
10. Please reply to each of the following statements. Failure to reply to all statements will result in your application being returned. Yes No The site shall comply with all applicable requirements of Chapter 94C, the Controlled Substances Act, regulation at 105 CMR 700.000 and all pertinent regulations of the Department of				
Mental Health or the Department of Mental Retardation, including, but not limited to, those pertaining to storage, labeling, administration and documentation of medication, medical back-up, review of medication and emergency procedures.				
Yes No All client or consumer prescriptions are noted in the client or consumer record on an approved medication and treatment form.				
Yes No The client or consumer record indicates the date that a prescription is filled and the quantity dispensed.				
Yes No All documentation is recorded in ink and shall not be altered.				
Yes No Medication occurrences are documented on the DPH approved revised Medication Occurrence Reporting form and are reported within the established time frames to the appropriate Departments.				
Yes No Site maintains a documented accounting system of the quantities of all controlled substances in schedules II - V stored by the site, which is reconciled at least every 24 hours, but preferably at the end of every shift.				
Yes No All prescription medications are kept in a DPH approved, substantially constructed, securely locked container used exclusively for medications.				

Page Two

Yes		All prescription medications are stored in the original containers labeled by the pharmacy or manufacturer.				
		Prescription medications requiring refrigeration are stored in either a locked box in a refrigerator refrigerator maintained at temperatures of 36 to 45 degrees Fahrenheit.				
persons	author	Access to medication containers and/or rooms in which medication is stored is restricted to ized to administer. Access to keys and knowledge of the location of the keys is a maximum extent possible.				
	Yes No Whenever possible, no more than a thirty-seven (37) day supply of the prescription medication for a client or consumer is stored at the site.					
Yes No Outdated and/or unused prescription medications are disposed of in accordance with applicable policies of the Department of Public Health.						
Yea	No	The Drug Control Program at the Department of Public Health should be notified of any missing medications no later than the next business day at (617) 983-6700. Business days and hours are Monday through Friday 8:45 AM to 5:00 PM.				
		I hereby certify that the information on this application is true to the best of my knowledge.				
11. Sig	ned un	der the pains and penalties of perjury.				
Signatu	ıre:	Date:				
		Authorized Person				
Print N	ame:					
Title						

Page Three

02

STAFF CERTIFICATION

POLICY ISSUE: Certification Process & POLICY NO: 02-1

Guidelines

POLICY SOURCE: April 1997 MAP Advisory DATE ISSUED: 4/97

DATES REVISED: 9/1/98, 8/1/00

 Direct care staff, including licensed nurses working in positions that do not require a nursing license, must be certified in MAP in order to administer medications in adult DMH or DMR community programs.

- 2. MAP certification to administer medication is valid for use only in adult DMH and DMR community programs that possess a current and valid Massachusetts Controlled Substances Registration from the Department of Public Health.
- 3. Staff meeting certain requirements may take equivalency-based testing [see policy no. 02-2, Equivalency Testing].
- 4. Certification is effective on the date that the Interim Letter to Administer Medication is issued (i.e. the date that the individual passes both the MAP written examination and skill test). Interim letters are valid for thirty (30) days.
- 5. Certification is valid for two years from the date of the Interim Letter (i.e. until the date of expiration) unless revoked or otherwise rendered invalid.
- Once a certificate expires staff have one year to recertify before they must retake the full certification training and examinations. During this period of time staff may not administer medications.
- 7. Staff who have failed a recertification examination are no longer considered to be certified. Therefore, such staff are not permitted to administer medications until they have passed the examinations and received a new Interim Letter to Administer Medication.
- 8. It is the responsibility of both the service provider and the individual certified for medication administration to track the certification period and to assure that certification remains current and valid.
- 9. Community programs are required to maintain acceptable proof of certification, consisting of copies of at least one of the following: (i) certificate (acceptable until May 10, 2001); (ii) wallet card certificate; (iii) letter of verification; or (iv) interim letter [see policy no. 02-3, Acceptable Proof of

Certification]. Copies must be kept at either the service provider's main office or at the site to which the staff are assigned. If copies are kept on-site, then a master list of all certifications with dates of expiration must be maintained at the service provider's main office. If copies are kept at the service provider's main office, then a master list of all certifications with dates of expiration must be kept at each site and the sites should be prepared to provide copies of certifications within 10 days of a request made by DPH, DMH or DMR. Master lists may be in written, printed, electronic or any other readily retrievable format.

POLICY ISSUE: Equivalency Testing POLICY NO: 02-2

POLICY SOURCE: December 1994 Advisory

Supervisor's Training Manual

DATE ISSUED: 12/94 DATE ISSUED: 5/15/98 DATE REVISED: 8/1/00

- 1. The following individuals may apply for equivalency-based testing, consisting of a written test and skill test, in lieu of attending the training:
 - a. Licensed staff with a current license.

b. Staff with current medication certification from another state (however, note that there is no reciprocity between states).

- 2. An application for equivalency testing along with one copy of the most current MAP Training Manual will be sent by the MAP Coordinator to the individual upon request.
- 3. The application [see policy no. 02-5, Staff Certification Forms] should be completed and signed by the individual requesting testing and mailed to the official test administrator (currently, the American Red Cross).
- 4. If the applicant fails either the written test or the skill test, he or she must take the full certification training course before testing again (which is considered their second try).
- 5. Upon successfully passing the equivalency-based examination, an individual will be certified to administer medications in either DMH or DMR adult community programs.

POLICY ISSUE: Acceptable Proof of Certification POLICY NO: 02-3

POLICY SOURCE: February 1998 DMH Memo DATE ISSUED: 2/9/98

DATES REVISED: 9/1/98, 8/1/00

- 1. Only the following four forms are acceptable proof of certification to administer medications:
 - a) The original or a copy of the <u>MAP certificate</u> issued to each individual staff person (this form is acceptable until May 10, 2001 at which time all certificates will have been replaced by wallet card certificates).
 - b) The original or a copy of the wallet card certificate issued to each individual staff person.
 - c) The original or a copy of the <u>letter of verification</u> issued to the service provider by the official test administrator (currently, the American Red Cross).
 - d) The original or a copy of a valid and current **approved interim letter** signed by the official test administrator and issued to each individual staff person. (The interim letter has an expiration date of 30 days after which staff may not administer medications unless the provider has a copy of one of the three other forms of proof of certification).
- 2. The application made to the test administrator for testing and certification is not acceptable proof of certification.
- 3. An individual's certification status may be verified against the central registry database by contacting the official test administrator at 800-962-4337.

POLICY ISSUE: Revocation of Certification POLICY NO: 02-4

POLICY SOURCE: April 1997 MAP Advisory DATE ISSUED: 04/97

DATE REVISED: 8/1/00

An individual's certification may be revoked in accordance with regulations of the Department of Mental Health at 104 CMR 15.03(6)(h)(4) and the Department of Mental Retardation at 115 CMR 6.06(6)(a). A certification may be revoked by the Departments, after an informal hearing, if the certified staff:

- 1. has been convicted of a crime involving controlled substances;
- 2. has furnished or made to the Departments any misleading or false statement in the application for or renewal of certification;
- 3. has failed to exercise proper regard for the health, safety and welfare of the program clients/consumers; or
- 4. is unfit to perform the duties for which the certification was granted.

The service provider shall be responsible for notification of their MAP regional/area coordinator(s) regarding any actions involving employees in these areas.

POLICY ISSUE: Staff Certification POLICY NO: 02-5

POLICY SOURCE: DMH/DMR Forms DATE REVISED: 10/07/97, 8/1/00

SEE FORMS ON FOLLOWING PAGES

MEDICATION ADMINISTRATION PROGRAM TESTING APPLICATION FORM

See reverse side for directions. Your Employer and MAP Trainer will help you complete this form.

1. Candidate Information	FOR RED CROS	
	OFFICE USE	ONLI
Social Security Number Maiden Name	·	
Last Name (Family)	Eligibility Code - Certificat	ion/Recertification
	1	
Street Apt. No.	Approved by	
City State Zip Code		<u>-</u>
	Date	
Work Telephone Number Home Telephone Number		
Date of Birth (Mo./Day/Year)	Provider DMR DMH	Payment
2. Provider Information 3. Training Program Information	Written	
To be completed by Employer (for certification only)	P/F/A	Date
To be completed by Trainer	Skills	
Provider/Agency Name Date Completed (Month/Day/Year) Training Program	P/F/A	Date
(FEIN) and MR or MH		
MAP Approved Trainer Code:	Trans.	
Location/City	P/F/A	Date
DPH Site Reg. Check One DMR DMH Signature		1 1
A. Tasking Information	Signature	Social Security #
4. Testing Information		
Register me for: Type of Test: (check one):	Provider DMR DMH	Payment
Location: (check one) Red Cross site Provider site (see instructions on reverse) If you want on-site testing, please contact the ARC	Written	•
Please check a Red Cross site. Please indicate your preference(s) below. You will be scheduled for	P/F/A	Date
the first available slot at the location you check. Please indicate any dates you are not available within the next 30 days (MonFri. 9-5).	Skills	Balo
I can take the tests at any of the locations below:		
☐ Boston ☐ Peabody ☐ Springfield ☐ Lowell ☐ Greenfield ☐ Waltham	P/F/A	Date
☐ Worcester ☐ Pittsfield ☐ Hyannis ☐ Fall River ☐ Leominster ☐ Wrentham ☐ Brockton ☐ New Bedford ☐ N. Attleboro ☐ Newton ☐ Haverhill		
Please Note: The space provided is for listing specific dates you will be unable to test. (For example, vacation, medical appointment.) The American Red Cross makes every effort to meet your requests but	Trans.	
vacation, medical appointment.) The American Red Cross makes every effort to meet your requests but they cannot be guaranteed.	P/F/A	Date
I am NOT available on the following dates:		1 1
	Signature	Social Security #
5. Questions		
1. Have you ever been convicted of a crime involving the manufacture, sale, dispensing, possession, or	Provider DMR DMH	Payment
Have you ever been convicted of a crime involving the manufacture, sale, dispensing, possession, or possession with intent to sell any controlled substance in the past five (5) years?	Written	-
☐ Yes ☐ No 2. Have you ever had a MAP certificate or health care related professional license withdrawn, rejected or		
I revoked?	P/F/A	Date
Yes No	Skills	
If yes, give reason:	P/F/A	Date
3. Have you failed the MAP Certification Test or Recertification Test three times within the previous 12 months?		/ /
	Trans.	
6. Signature / Date	P/F/A	Date
I certify that the information on this registration form is true and accurate, and may be subject to verification and I am the person whose name appears on the form.		
Signature Date	Signature	Social Security #
		-

This form is your application to take the tests which will place you on the MAP Central Registry. Your Employer and Trainer will help you complete this form. Print all entries clearly in ink, one letter or number to a box. Unreadable or incorrect information may delay scheduling you for your tests. The numbers for each section listed below match the numbers on the form.

1. CANDIDATE INFORMATION Social Security Number:

Print your Social Security Number. It is the primary means of identifying you in the MAP Central Registry. If you do not have a Social Security Number please enter all zeros.

Name: Enter your name as you want it to appear on your certificate.

Last (Family): Print the first fifteen letters of your last, or family name. If you use more than one last name, leave a space empty between the names. First: Print the first ten letters of your first name. Malden: Print the first fifteen letters of your maiden name after your Social Security Number.

Address: Enter your mailing address. This is the address to which your MAP certificate will be sent.

Street: Print your street address. Leave an empty space between the street number and name. Apt. No.: Print your apartment number if you have one. City: Print the name of the city or town. If there are two words, leave a space between the words. State: Print the U.S. Postal Code abbreviation for the state (Massachusetts=MA). Zip Code: Print your 5-digit Zip Code.

Work Telephone Number:

Print the area code and telephone number where you can be reached at work.

Home Telephone Number:

Print your home telephone number here.

Date of Birth

Print the numbers of the month, day and year of your birth in the spaces provided. If the number is one digit, place a 0 first.

Example: April 15, 1965 = 04-15-65.

2. PROVIDER INFORMATION (This section is to be completed by your employer)

Print the provider agency name, Federal Employer Iden-

tification number (FEIN) and "MR" or "MH" and city where your DMR or DMH executive office address is located. If you are not currently working for a provider, print "NOT EMPLOYED" on the top line, leaving the rest blank.

DPH Site Registration Number:

Enter your site's DPH 5 digit registration **number**. DPH site registration number is found on your blue Registration form. For example, MAP 01234. If an employee is working at multiple sites, please designate a primary work site.

3. TRAINING PROGRAM INFORMATION (This section to be completed by your trainer) Date Completed Training Program:

Print the month, day and year the training program was completed.

MAP approved trainer code.

Print the four digit MAP trainer code and sign.

4. TESTING INFORMATION

Test eligibility: Check eligibility box.

Location:

Check the regional site choice. If Provider site is checked please call 1-800-962-4337 for special arrangements. Please note any days you are <u>not</u> available for testing. M-F, 9-5.

5. QUESTIONS:

Answer all the questions listed. If the questions are not answered, scheduling will be delayed.

6. SIGNATURE/DATE:

Read the signature statement and sign your name as you would sign a check. Print the date you complete this form to the right of your signature.

DO NOT ENTER ANY INFORMATION IN THE AREA MARKED "FOR RED CROSS - TESTING OFFICE USE ONLY."

Mail to: American Red Cross Testing Office

MAP

786 Main Street Melrose, MA 02176

Phone (800) 962-4337 • (781) 979-4010

Revised 12-99



INTERIM LETTER TO ADMINISTER MEDICATION

MEDICATION ADMINISTRATION PROGRAM TESTING AND REGISTRY SCORE REPORT

Site Pr	ovider Federal ID# and MR o	r MH	Date
Vota		<u> </u>	
Candidate Last Name (Family)	řid Na	st Name	M.I.
Social Security Number			
This individual passed			
Written Test Skills Te	est Recertification		
This interim letter, when signed lister medication in accordance viberartment of Mental Refardation	vith Repartment of Public Hea	alth, Department of I	Mental Health and
This interim letter expires thir administered under this interi	ty (30) days from the date n m letter after this date.	oted below. <u>Medica</u>	ation cannot be
Applicant's Signature	Examination Date	Examiner's Sig	gnature
		<u> </u>	
		Examiner's Na	ime (print)

REVISED 12-99

03

TRAINING AND CURRICULUM

POLICY ISSUE: Becoming a Trainer POLICY NO: 03-1

POLICY SOURCE: MAP Training Policy DATE ISSUED: 10/15/97

- Regulations at 105 CMR 700.003(F)(2)(a) require that a trainer be a registered nurse, nurse practitioner, physician assistant, registered pharmacist or licensed physician who meets the applicable requirements for a trainer.
- The jointly established requirements for a trainer are:
 - Currently licensed as a registered nurse, nurse practitioner, physician assistant, registered pharmacist, or physician in Massachusetts;
 - At least two years of experience in his/her profession;
 - Completion of the DPH approved "Train the Trainer" Program offered through the Departments of Mental Health and Mental Retardation;
 - A letter of approval from the Medication Administration Program
- Beginning December 1, 1997 the "Train the Trainer" program will be offered by DPH/DMH/DMR every two months in locations that will be announced in the future. The program will be conducted jointly by a DMH MAP coordinator and a DMR MAP coordinator. Technical assistance will be provided as needed by the DPH clinical reviewer. Individuals who meet the above criteria and wish to become a trainer should contact an area/regional MAP coordinator to obtain a list of scheduled trainings.
- Trainers must provide an area/regional MAP coordinator with an updated resume and proof of licensure within 90 days from the issuance of this advisory and then upon each renewal of their license (every two years). If licenses are copied and forwarded to the coordinators, the trainer should write "void" on the license before submitting the copy.
- MAP coordinators must forward trainers' resumes, names, addresses, telephone numbers,
 professional license numbers with the dates of expiration and attendance at required meetings to the
 Central Office at the Department of Mental Health. This information will be data entered into the
 DPH/DMH/DMR shared database. It is advisable that MAP coordinators have access to the data
 base and, if necessary, hard copies of the trainers' resumes.

POLICY ISSUE: Being a Trainer POLICY NO: 03-2

POLICY SOURCE: MAP Training Policy DATE ISSUED: 10/15/97

Being a Trainer

- To maintain their approval status, trainers must remain current regarding all DPH approved training
 and testing materials, advisories, policies and other changes through meetings scheduled with a
 MAP coordinator annually, and as determined by DPH. In addition,, trainers must teach at least
 one training every year.
- Trainers not attending scheduled meetings will be notified that their approval status has been revoked.
- It is the responsibility of the service provider to assure that the trainer of their staff is an approved trainer. After July 1, 1998 applications for staff certifications will not be accepted from trainers who have not met the criteria. Service providers may contact their central office to confirm a trainer's approval.

POLICY ISSUE: Trainings POLICY NO: 03-3

POLICY SOURCE: MAP Training Policy DATE ISSUED: 10/15/97

- Regulation at 105 CMR 700.003(F)(2), 115 CMR 6.06(5) and 104 CMR 15.03(6) require all training programs to meet specifications jointly established by DPH, DMH and DMR. As stated in the DPH approved training materials, training programs must not be less than 16 hours in length, including classroom instruction, testing and the practicum. Trainers must comply with this specification.
- The Medication Administration Program's training program is specific to DMH/DMR registered MAP programs only. MAP trainers may only train those individuals who will be administering medications in registered DMH/DMR adult settings.
- All trainers must use the most recent DPH approved training manual and testing materials. The
 approved materials will hence forth be marked in the lower left hand corner with a DPH logo. All
 training manuals and testing materials must be submitted by DMH and DMR to DPH for approval
 before use. Recommendations for changes to the training materials by a trainer may be submitted to
 DMH and/or DMR.
- Staff training and certification is transferable between DMH and DMR only and is valid only in adult DMH/DMR registered MAP programs.
- Because certificates are transferable between all DMH/DMR adult community residential programs, all portions of the training manual must be taught. No part may be eliminated or modified due to a trainer's or service provider's preferences or personal beliefs or for any other reasons. Failure to teach the entire training would lead to inconsistencies in training and qualifications. If DMH/DMR or service provider policies prohibit or discourage use of any portion of the training, (e.g. staff may not administer via a specific route) then staff should be instructed on the specific rules on site.
 Nevertheless, that portion of the training must be provided as part of the basic training.
- MAP coordinators will compile a list of their area/regional trainings for certification and
 recertification of direct care staff. Private service providers and individual trainers are encouraged
 to participate. If they choose to do so, then they should submit a list of their trainings to the
 area/regional MAP Coordinator. Scheduled Area MAP Training forms will be completed by each
 MAP coordinator and be forwarded to the appropriate Central Office and the clinical reviewer at
 DPH by the fifteenth of each month. If trainings are scheduled far enough in advance, this may be

done on a quarterly basis. Implementation of this process shall begin on November 1, 1997. A copy of a Scheduled Area MAP Training form is attached.	

POLICY ISSUE: Additional Training for POLICY NO: 03-4

Vital Signs

POLICY SOURCE: MAP Training Policy DATE ISSUED: 10/15/97

• To administer medications that require the monitoring of vital signs for administration, e.g. Digoxin, Inderal, Clorazil, or Tylenol ordered for a fever, certified staff must be proficient in this skill. Training for vital signs is not offered in the MAP training; therefore additional training must be provided to those certified staff whose responsibilities include monitoring of vital signs for medication administration. Regulation at 105 CMR 700.003(F)(1)(b) states "...that medication is administered only by properly trained and certified personnel." Furthermore, regulation at 105 CMR 700.003(F)(2) states that these personnel must have successfully completed "a training program which meets the specifications for a training curriculum ... established jointly by the Department of Public Health and the Department of Mental Health and/or Department of Mental Retardation".

• Service providers are responsible for (1) obtaining instructions from physicians regarding the need for monitoring of vital signs for medication administration; (2) obtaining specific, written parameters for vital signs, if appropriate; (3) training their staff to take vital signs; and (4) maintaining a current list of trained and competent staff that includes the name(s), address(es) and telephone number(s) of the trainer(s). This list should be maintained both at the site and in the provider's main office

POLICY ISSUE: Testing POLICY NO: 03-5

POLICY SOURCE: MAP Training Policy DATE ISSUED: 10/15/97

- For initial certification, staff must bring a picture ID with them to testing. For recertification, certified staff must bring their certificate (or a copy)and a picture ID with them.
- Trainers must check the required documents before testing staff.
- When direct care staff pass the required written test and practicum, trainers **must** provide the staff and the program with a copy of the approved interim letter signed by the tester. This serves as verification of passage of the written testing and practicum and permits staff to administer medications during the interim period between testing and the issuance of certificates. The interim letter is valid for ninety (90) days from the date of issuance. Implementation of the new interim letter shall begin on November 1, 1997. A copy is attached.
- If an individual answers yes to any one of the three questions on the revised one-sided application also issued with the 10/15/97 Training Policy, the trainer should not issue the interim letter. Rather all information, testing materials and the individual's letter should be forwarded to the appropriate Central Office for review.
- Applicant has 3 opportunities to pass for certification and/or recertification. For a person who fails certification 3 times, there is a one year waiting period before a person can test again. After the one year period, the person must retrain before retesting. For a person who fails recertification 3 times, the person must undergo the entire certification process including retraining and retesting as soon as possible.
- All tests, skill check lists and practicums must be submitted with applications to the MAP area/regional coordinators.
- New written examinations are developed periodically. Upon the release of new examinations, it will be necessary to destroy all previous written examinations.

POLICY ISSUE: Specialized Training Program POLICY NO: 03-6

POLICY SOURCE: MAP Training Policy DATE ISSUED: 10/15/97

• The regulation at 105 CMR 700.003(F)(5)(e) requires staff to have successfully completed a specialized training program prior to administering "parenteral drugs generally intended for self administration, or drugs administered by gastric tube". Such training programs must be approved by the Department of Public Health and the Departments of Mental Health and/or Mental Retardation. At present there are no approved specialized training programs. Proposals for such programs must be submitted to DMH and/or DMR for review and approval prior to submission to DPH for final approval.

04

ROLE OF NURSING

POLICY ISSUE: Role of Nursing in MAP POLICY NO: 04-1

POLICY SOURCE: 1997 BoRN Advisory

DATE ISSUED: 2/16/94

DATE REVISED:05/14/97

Board of Registration in Nursing Advisory Ruling

Nursing Practice Related to Medication Administration by Certified Program Staff in Community Residences - Departments of Mental Health and Retardation

This Advisory ruling is issued to guide the practice of Registered Nurses and Licensed Practical Nurses employed in, or employed as nurse consultants to, community residences under the auspices of the Massachusetts Department of Mental Health and/or Department of Mental Retardation.

The areas of nursing practice covered in the Board's Advisory Ruling include:

- 1. teaching the curriculum for the certification of program staff in medication administration;
- 2. accountability for medication administration to clients for whose care the nurse is responsible;
- 3. the role of nurses who provide episodic care to clients, but who are not responsible for the client's overall care:
- 4. the requirement for a valid order from an authorized prescriber prior to administering medication;
- 5. the duty to report observed, inappropriate medication administration by certified staff;
- 6. providing technical assistance and advice, as in regulations at 115 CMR 6.06 (6) (f), and 104 CMR 15.03 (6) (h) (9); and
- 7. the role of the nurse consultant under the Medication Occurrence Reporting System, implemented 12/01/96.

Teaching the Curriculum for Medication Administration Certification

 Nurses deemed qualified by the Departments of Mental Health (DMH) or Mental Retardation (DMR) to teach the established program of instruction for medication administration may instruct unlicensed program staff in the didactic and practical components of the program leading to certification in medication administration.

- The nurse instructor does not bear on-going accountability for the practice of the staff person who is certified under the standards established by DMR and/or DMH.
- Nurses who have not been trained as instructors for the DMR/DMH medication administration
 program should not participate in supervising or monitoring the initial administration of medications
 to clients by newly certified staff.
- Monitoring of initial medication administration is not a formal part of the DMR or DMH training program. However, the Board strongly supports such supervision by qualified nurse instructors.
 This does not constitute delegation of medication administration by the nurse instructor.

<u>Accountability for Medication Administration to Clients for Whose Care</u> the Nurse is Responsible

- Nurses shall not delegate, assign or allow unlicensed, certified staff to administer medications to
 clients for whose direct care the nurse is responsible. When a licensed nurse is responsible for a
 client's direct care, such responsibility shall include administration of all medications.
- In residences where program staff are responsible for direct care provided to certain clients, and licensed nurses are responsible for direct care provided to other clients, the nurse shall only be accountable for administration of medications to clients for whom he/she has direct responsibility or for medications the nurse personally administers to any other client.
- Administration of medications by certified program staff to clients for whom the certified staff person has direct care responsibility, is not considered delegation and/or supervision, as defined in 244 CMR 3.05, by a nurse who is providing care to other clients in the same residence.
- A licensed nurse is only accountable for the medications he/she administers. A nurse is not accountable for medications administered by certified direct care staff.

Medication Administration and the Nurse Who Provides Episodic Care

Nurses who provide episodic care to clients in DMR and/or DMH community residences include
nurses employed by Visiting Nurse Associations or home health agencies, as well as nurses
employed by DMH and/or DMR for the purposes of intermittent or episodic health assessment and
nursing intervention. For the purposes of this Advisory, the nurse functioning in this role is not the
care provider responsible for managing or supervising overall client care, and is not accountable for
medication administration by certified program staff.

Providing Technical Assistance and Advice 115 CMR 6.06 (6) (f) and 104 CMR 15.03 (6) (h) (9)

- Nurses who are employed by DMR and/or DMH to provide or arrange for technical assistance and
 advice, as described in the regulations noted above, shall provide assistance about *systems* related
 to medication administration issues as required. Examples of **systems** include, but are not limited to
 transcribing, ordering, procuring, documenting; destroying and storing of medications.
- Questions about client care problems related to medications shall be directed or referred to the
 appropriate licensed practitioner (MD/NP/PC) either via telephone, of floe visit, clinic visit, or
 emergency room visit, or the appropriate emergency response system, per Department of Public
 Health policies.

Nurse's Requirement for a Valid Medication Order

- The Nurse Practice Act requires nurses to have an order from an authorized **prescriber prior** to administering ALL prescription and non-prescription (over-the-counter) medications.
- Medication orders transcribed by an unlicensed person must be verified by a licensed nurse prior to being implemented by a nurse. Methods of verification vary, and should comply with written employer policies.
- A nurse who accepts a verbal/telephone order relayed by an unlicensed staff person may implement the order. The nurse is accountable for her practice in this matter. This includes ensuring that the orders originate from an authorized prescriber and ensuring that any orders he/she carries out are reasonable based on the nurse's knowledge of the client and his care needs. If at any time the nurse has a question about the appropriateness of an order, the nurse is accountable for clarifying the order with the original prescriber.
- As evidence of a valid medication order, a nurse may use a pharmacy-labeled medication container
 that includes the client's name, the name and phone number of the pharmacy, the name of the
 prescriber, the name of the medication, the dose and route of administration, the frequency and/or
 time of medication administration, the date of the order and the discontinuation date, and any
 specific directions for administration.

Nurses' Duty to Report Inappropriate Medication Administration

• Nurses who observe inappropriate activities related to administration of medication by certified program staff should follow the established Department of Mental Health/Mental Retardation and Department of Public Health policies for reporting these occurrences.

Role of the Nurse Consultant Under the Medication Occurrence Reporting (MOR) System, Implemented 12/01/96

- Department of Public Health (DPH) policy for medication occurrence reporting includes contacting
 a professional consultant (registered nurse, pharmacist, other licensed practitioner) in the event of an
 occurrence involving medication administration that is inconsistent with the practitioner's
 prescription.
- According to DPH policy, the consultant contacted as the result of a Medication Occurrence will
 recommend action (medical intervention), including: lab work or other tests; physician visit; clinic
 visit; emergency room visit; hospitalization; and other recommendations, as noted on the MOR
 reporting form.
- When the consultant is a Registered Nurse (R.N.), the nurse's legal scope of practice permits him/her to recommend: a) contact with the appropriate licensed practitioner (MD/NP/PC) either via telephone, office visit, clinic visit or emergency room visit; and/or b) calling the appropriate emergency medical response system.
- A nurse consultant may recommend consultation with a MAP Coordinator or another consultant.
- it is not within R.N. scope of practice to order that lab work or other tests be performed. An R.N. may recommend to the reporting staff person that an appropriate provider be contacted to order any lab work/test that may be indicated.
- it is not within R.N. scope of practice to order hospitalization of a client.
- it is not within R.N. scope of practice to recommend that a medication dose be adjusted, i.e., increased, decreased, omitted or repeated.
- An R.N. consultant who is an authorized advanced practice nurse (UP, NM, or Psychiatric Clinical Specialist) may prescribe and order tests and therapeutics, consistent with the nurse's legal scope of advanced practice and with the individual nurse's written practice and prescribing guidelines.

Issued: 2/1 6/94 Revised: 5/14/97

05 CONSULTANTS

POLICY ISSUE: Role of Consultants in MAP POLICY NO: 05-1

POLICY SOURCE: MAP Consultant Policy DATE ISSUED: 04/97

Utilization of Consultants in the Medication Administration Program

For the purposes of the Medication Administration Program (MAP), the consultant is a professional, knowledgeable and skilled in medication administration systems, who provides technical assistance and advice to certified staff. Regulations at 105 CMR 700.003(F)(1)(g) require that the professional consultant be a registered nurse, registered pharmacist or practitioner.¹

Consultants provide advice, assistance and recommendations and answer questions on medications and on issues regarding medication administration systems. This may include, but is not limited to:

- interpreting a practitioner's prescription for the staff;
- providing information on a medication's indications for use and side effects; and
- recommending appropriate actions to follow a medication occurrence (error involving the wrong medication, individual, dose, time or route of administration).

The information that the consultant supplies to the direct care staff is broad-based, general information that does not require, but does not preclude, direct observation, information on the client's/consumer's medical history, or direct follow-up. Consultants function within their scope of practice (e.g. a registered nurse or pharmacist could clarify for staff a physician's medication order but only a licensed practitioner could order lab work). If the consultant believes that he/she has insufficient information and/or knowledge to make a recommendation concerning a particular occurrence, then the consultant should recommend that the direct care staff contact the prescribing practitioner, dispensing pharmacist, or another MAP consultant who is better able to provide information to the staff.

MAP is a direct authorization model under which certified staff function in accordance with the orders of a licensed practitioner. Consultants do not control, supervise or monitor certified staff's medication practices. The service provider, not the consultant, is responsible for the direct care of the client/consumer, including medication administration by the certified staff.

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¹ Regulations at 105CMR 700.001 define in part a practitioner as a physician, dentist, podiatrist, or other person (e.g. nurse practitioner, psychiatric nurse clinician, physician assistant, nurse midwife) who is registered to prescribe controlled substances in the course of professional practice.

In addition to the requirement that certified staff have 24-hour access to a consultant, MAP policies require that consultants be contacted for every medication occurrence. This ensures that in the case of a medication occurrence certified staff will have:

- access to the technical assistance they need to interpret the practitioner's prescription;
- information on appropriate actions following an occurrence; and
- guidance regarding the medication occurrence reporting process should they require it.

In the case of a medication occurrence, the DPH registrant (the service provider) has the responsibility to:

- document on the MOR form that a consultant has been contacted;
- determine whether or not an occurrence has happened;
- determine what, if any, action(s) will be taken by direct care staff to care for the client/consumer; and
- report to DPH/DMH/DMR within the established time frames.

Consultants, while required to provide technical assistance in these matters, are not expected to make these determinations or file reports with DPH/DMH/DMR.

Consultants should make independent arrangements with the program(s) they serve. A letter of agreement between the program and the consultant that describes the consultant's role and responsibilities is strongly recommended.

06

MEDICATION ADMINISTRATION

POLICY ISSUE: Administration of Insulin & POLICY NO: 06-1

Medications via G-tube/J-tube

POLICY SOURCE: April 1997 MAP Advisory DATE ISSUED: 04/97

• Certified staff must have completed a specialized training program approved by DPH and taught by approved trainers before they may administer medications via G-Tubes/J-tubes and/or parenteral/injectable medications, including both insulin and epinephrine. This specialized training program is now being developed by DMH and DMR and will be submitted to DPH for review and approval. Until this process has been completed and staff have been appropriately trained, certified staff may not administer medications via these routes. This does not, however, preclude certified staff from monitoring those individuals who self-administer their insulin and/or epinephrine as long as syringes are either filled by client/consumer or prefilled by licensed individuals or the manufacturer.

POLICY ISSUE: PRN Medications POLICY NO: 06-2

POLICY SOURCE: April 1997 MAP Advisory DATE ISSUED: 04/97

DATE REVISED:9/1/98

- Physician orders for all PRN medications must have specific target symptoms and instruction(s) for their use (e.g. Tylenol ii tabs po q4 hrs. prn for a fever >101). Certified staff may administer PRN medications only according to the practitioner's prescription and not according to any assessments or medical decisions/judgments independently made by them or other direct care staff. For instance, in the above example, the order for Tylenol could not be given for a headache.
- If PRN orders are unclear, the consultant must be contacted.
- Administration of PRN medications requires additional documentation in a client's/consumer's progress notes, on a medication comment sheet/log, or on the reverse side of the medication sheet explaining the reason for its use and providing information on the medication's effectiveness.

POLICY ISSUE: Prefilling of Syringes POLICY NO: 06-3

POLICY SOURCE: December 1994 MAP Advisory DATE ISSUED: 12/94

Pre-filling syringes is allowed when performed by licensed individuals. However, there are
conditions that must be adhered to when pre-filling syringes. Namely, all syringes, including
pre-filled syringes, must be stored in a secure area when not needed, kept on "count", and
unlicensed staff must have specialized training to administer parenteral/injectable medications. Thus,
until a formal advanced certification process is implemented, administration of injectables to
non-self-medicating individuals must be done by a licensed individual.

POLICY ISSUE: Pre-pouring/Pre-packaging POLICY NO: 06-4

of Medications

POLICY SOURCE: April 1997 MAP Advisory DATE ISSUED: 04/97

• Regulations of the Department of Public Health at 105 CMR 700.003(F)(3) requires all programs to maintain adequate storage, security and handling of medications. Therefore, medication is never to be prepared at any time except <u>immediately</u> prior to the administration of that medication. When a medication is "pre-poured" by staff, the integrity of that medication can no longer be guaranteed.

- Certified staff are not permitted to pre-pour or pre-package medications, except as directed under the LOA policy, or to administer medications poured or pre-poured by another individual including certified or licensed persons.
- Included among these prohibited activities is the setting up of medication planners and the prepouring of medications for training purposes. This does not preclude staff from monitoring consumers/clients who set up their own medication planners.

POLICY ISSUE: Medication Administration POLICY NO: 06-5

Times

POLICY SOURCE: 1997 DMH Memorandum DATE ISSUED: 8/14/97

Programs must have a medication policy & procedure describing its administration times for
medications which should include information on qd medications. Physicians' Orders are not
required to have exact administration times, however, the physician may choose to specify this
information. Orders stating the frequency as bid, tid, etc., are acceptable. For qd medications,
programs should seek clarification from the physician when the qd medication should be given.

POLICY ISSUE: Vital Signs POLICY NO: 06-6

POLICY SOURCE: Policy Manual DATE ISSUED: 9/1/98

Vital Signs

Although health care providers are ultimately responsible for individuals under their care, the Departments acknowledge the important ongoing role service providers have in consulting with health care providers regarding matters such as medication administration. Routine consultation by service providers with an individual's health care provider regarding medication administration and the possibility for the need to monitor vital signs for safe administration provides for continuous quality of care that ensures safe and effective medication administration.

In addition, regulations of the Department of Public Health at 105 CMR 700.003(F)(1)(b) state "The program shall establish, maintain, and operate in accordance with policies which ensure that medication is administered only by properly trained and certified personnel." To administer medications that require the monitoring of vital signs for administration, e.g. Digoxin, Inderal, Clorazil, or Tylenol ordered for a fever, certified staff must be proficient in this skill.

Presently there is no mechanism in place to readily determine if vital signs are required for administration of a particular medication. Moreover, current MAP curriculum does not include training of certified staff in the taking of vital signs. Since vital signs may be required for some medication administration, service providers must develop a policy addressing vital signs and must ensure that their staff are properly trained as needed so that medications are administered appropriately and safely. This policy must:

- 1. Include a method(s) developed by the service provider to assure that written instructions, if needed, are obtained from the health care provider(s) regarding the need for monitoring of vital signs for medication administration. The method(s) developed by the service provider must clearly state whether vital signs are or are not required for medication administration. This may be easily met by adding a question to the health care provider consult form, e.g. "Please document if you wish to have vital signs taken before the administration of any of these medications."
- 2. State whether the training offered by the provider will be consumer specific, program specific or general in nature.
- 3. List the equipment to be used by staff to monitor vital signs, e.g. digital equipment, glass thermometer, stethoscope.

- 4. Specify the appropriate documentation of staff training . Documentation must include the date of the training, name(s) of staff trained, and the name, address and telephone number of the trainer(s).
- 5. Require that specific, written parameters be obtained from the health care provider if vital signs are required for medication administration. This also may be added to the health care provider consult form, e.g. "If vital signs are required, what parameters do you wish?"
- 6. Require proper documentation of vital signs on the Medication and Treatment sheet, including documenting vital signs below the initials of the certified or licensed staff administering the medication.
- 7. Include guidelines for follow-up with the Health care provider if vital signs are outside of the established parameters.
- 8. Require documentation of the notification of the health care provider and any follow-up instructions/orders received.

POLICY ISSUE: Allergies POLICY NO: 06-7

POLICY SOURCE: 1997 DMH Memorandum DATE ISSUED: 08/14/97

DATE REVISED: 9/1//98

All allergies must be listed on the following:

- Medication and Treatment Sheet (all pages, every month)
- Physician Consult Form
- Emergency Information Sheet
- all other appropriate forms

POLICY ISSUE: Blood Glucose Monitoring POLICY NO: 06-8

POLICY SOURCE: 1998 DMH Letter DATE ISSUED: 02/24/98

DATE REVISED: 04/98

The care of an individual with Diabetes has changed tremendously over the past decade. Today, blood glucose monitoring is performed in the home setting by either the individual or the caregiver and assists the health care provider in providing the most up-to-date care to these individuals. DMH/DMR community residential programs that conduct blood glucose monitoring must adhere to the following:

- Certified staff may perform blood glucose monitoring using "fingersticks", e.g. *Accuchecks*, in accordance with a health care provider's order provided the staff person first receives instruction in the equipment and procedure involved from a licensed nurse.
- Training and competency must be appropriately documented and maintained at the service provider's main office and on site.
- A service provider may wish to use their own nurse for this training or, if the service provider does
 not employ a nurse, may wish to use a nurse from a Visiting Nurse Association or Home Health
 Agency or staff at the health care provider's office.

POLICY ISSUE: Over-the-Counter Medications POLICY NO: 06-9

POLICY SOURCE: March 1996 Training Manual DATE ISSUED: 9/1/98

Medication Administration Program Over-the-Counter Medications

While over-the Counter (OTC) medications may have fewer regulatory controls than prescription medications, they may have significant medical impact especially when an individual is taking prescription medications along with OTC medications. Therefore, the Departments of Mental Health and Mental Retardation have established the following guidelines that have been approved by DPH. Service providers should incorporate these guidelines into their MAP policies and procedures. Certified staff must follow these guidelines when administering over-the-counter medications.

- All over-the-counter medications must be administered according to the same procedure used to administer prescription medications (March 1996 Training Manual, 21).
- When administering medications, certified staff must compare the health care provider's order with the medication and treatment sheet and the prescription label (March 1996 Training Manual, 50, 51). All three items must match before certified staff may administer the medication.
- Over-the-counter medications must have a label that includes the same information as a prescription label. This includes: name of the consumer, name of the medication, strength of the medication, directions for use including frequency and route, and the expiration date (March 1996 Training Manual, 73 & 76).
- Stock OTC medications permitted on site are limited to Regular Strength Acetaminophen, Milk of Magnesia, Guaifenesin Cough Syrup and Kaopectate. If stock OTC medications are used, the service provider must train certified staff to administer medications from stock supplies.
- A label that reads take or use "as directed" is not permitted (March 1996 Training Manual, 50).
- A prescription is not required for the purchase of over-the-counter medications; however, a
 prescription may be required by the pharmacy in order for the pharmacy to label the
 medication.

- A health care provider's order is required for the administration of over-the-counter medications (March 1996 Training Manual, 21.)
- Certified staff must document the administration of over-the-counter medications in the same manner as prescription medications are documented (March 1996 Training Manual, 21).
- Over-the-counter medications must be kept locked with the appropriate prescription medications (March 1996 Training Manual, 21.)
- Over-the-counter medication that is not administered according to the health care
 provider's order is a medication occurrence and must be reported to DMH/DMR/DPH per
 the requirements of the Medication Occurrence Reporting System (March 1996 Training
 Manual, 21.)

07

SELF-MEDICATION

POLICY ISSUE: Definition & Criteria POLICY NO: 07-1

POLICY SOURCE: December 1994 MAP Advisory DATE ISSUED: 12/94

Supervisor's Training Manual DATE ISSUED: 05/15/98

DPH, DMH and DMR each supports the concept of client self-administration whenever feasible. Nothing in the MAP regulations should be viewed as an impediment to a client's transition to self-administration. If an existing policy inhibits the goal of self-administration, it should be brought to the attention of the DPH for review.

While different programs may, for the purposes of case management, use various terms to denote stages of a client's transition to self-medication, for the purposes of the MAP program a client is self-medicating, by definition, only when the medication is under the complete control of the client with no more than minimal assistance from program staff. For clients who are non-self medicating or in transition and do not meet the above criteria, certified/licensed staff will be responsible for documenting medication usage and ensuring its security.

Medication reminders or prompting of self-medicating individuals is permissible under the MAP regulations. Reminding and prompting a client to take their medication does not require licensed or certified staff, however some training is advised. Thus, personal care attendants, specialized home care providers, respite care providers and other staff providing similar services which do not include medication administration do not require licensure or certification and are thus exempt from the MAP requirements (see section 01-2).

1. Criteria for Self-Medication

In order to be considered self-medicating an individual must:

- Demonstrate an ability to store his/her medication so that it is inaccessible to others
- Demonstrate an ability to take the medication independently.
- Verbalize an understanding of the type of medication, its purpose and for what symptoms it is being prescribed.
- Demonstrate knowledge of the frequency of doses. (Verbal reminders may be used.)
- Be familiar with the most common side effects of the medication, if any.

Individuals who self-medicate:

- Do not store their medications with those of non-self-medicating individuals unless it is required to protect the safety of other consumers.
- Do not need to document their medication self-administration.
- Do not file medication occurrence reports.

2. For individuals who are self-medicating, staff may:

- Verbally remind them to take their medication.
- Do periodic inventory of their medication.

POLICY ISSUE: Learning to Self-Medicate POLICY NO: 07-2

POLICY SOURCE: April 1997 MAP Advisory DATE ISSUED: 04/97

• DMH/DMR regulations at (104 CMR 16.07, 115 CMR 6.00) regarding community residential programs require a clinical team to develop a teaching plan for clients/consumers who are learning to self-medicate in the ISP and/or PTSP that includes goals to be achieved within a specified time frame and a plan of action for obtaining medications consistent with MAP regulations. For the purposes of DPH regulations for MAP, individuals who are learning to self-medicate are considered to be non-self- medicating and DPH regulations at 105 CMR 700.000 apply. The LOA policy may not be used to cover the prepouring of medications for the purpose of training consumers/clients in self-medication or for any other reason other than the actual unscheduled LOA.

POLICY ISSUE: Appropriate Use of Pill Dispensers POLICY NO: 07-3

POLICY SOURCE: 1997 DMH Memorandum DATE ISSUED: 08/14/97

DATE REVISED: 9/1/98

Repackaging of medication by the consumer is permissible if the consumer is learning to self medicate according to a documented Program Specific Treatment Plan (PSTP) or Individual Service Plan (ISP) developed by the clinical treatment team. (See DPH Advisory dated 4/15/97)

- 1. If the consumer is repackaging medications, the PSTP/ISP must include specific steps and a time frame within which an individual will meet his/her goals.
- 2. Based upon a consumer's skill assessment, documentation from the prescribing health care provider(s) indicating approval for self administration of medications for the period identified in the PSTP/ISP training plan may be required. This documentation must include the number of days an individual may hold his/her medications.
- 3. The medication container/pill dispenser must be clearly labeled to include consumer name, prescriber's name, medication name, dosage, administration instructions, and cautionary statements, if any.
- 4. Consumers must be provided with written medication information sheets.
- 5. Programs should document the packaging and transfer of medications to the consumer on an observation sheet and/or progress note. Documentation should indicate that medication was packaged by the consumer, date medication was packaged/transferred by the consumer, initials of the certified staff supervising consumer repackaging, and name, dosage, and quantity of medication dispensed.
- 6. Programs may have staff sign initials on <u>observation sheet</u> indicating pill dispenser was returned by consumer empty to indicate consumer took their medication.

POLICY ISSUE: Skill Assessment POLICY NO: 07-4

POLICY SOURCE: Supervisor's Training Manual DATE ISSUED: 05/15/98

In preparation for the ISP/PSTP a health skills assessment will be completed for all individuals. If this assessment indicates that the individual could benefit from learning self-medication, a team including staff, a nurse consultant if available and the individual will participate in specifically assessing the individual's self-medication. There are a number of Self-Medication Assessment forms available throughout the state.

POLICY ISSUE: Development of a Teaching Plan POLICY NO: 07-5

POLICY SOURCE: Supervisor's Training Manual DATE ISSUED: 05/15/98

- The Assessment of Self-Medication Skills is the basis for developing a medication skills teaching
 plan. The individual's physician will prescribe the correct medication and monitor its effectiveness.
 It is recommended that the physician also be included in the decision to begin teaching selfmedication skills. This may require some explanation of the methods used to teach and what kind of
 supervision and monitoring will be used to ensure that the person receives the correct medication as
 prescribed.
- The training plan will be individualized and will be documented in the ISP or PSTP.
- Documentation must include specific steps and a time frame within which the consumer will meet his/her goals. In accordance with the ISP/PSTP systems, there will be quarterly reviews.
- Staff may not pre-pour medication for individuals who are learning to self-medicate. Individuals may, under the supervision of certified or licensed staff pour their own medication into appropriately marked weekly medication containers.
- If use of a weekly medication container is to be part of their self-medication plan it should be one of the first steps that they learn.

POLICY ISSUE: Documentation POLICY NO: 07-6

POLICY SOURCE: Supervisor's Training Manual DATE ISSUED: 5/15/98

Until individuals meet the criteria for self-medicating status, staff should witness the individual preparing and taking medication. If a weekly pill dispenser is used in the process of learning to self-medicate, staff should document the packaging by the consumer of his/her medications on an observation sheet and/or progress note. Documentation should indicate that medication was packaged by the consumer, date medication was packaged, initials of the certified staff supervising consumer repackaging and name, dosage and quantity of medication packaged. A Medication and Treatment sheet may be used for this purpose if it clearly states that staff is observing the consumer in the preparation and self-administration of his/her medication.

Certified staff may not sign off on the Medication and Treatment sheet that a medication has been administered unless staff actually administer a consumer's medication. Certified staff may; however, sign that he/she has observed a consumer take the appropriate medications. Again this may be clearly noted on a Medication and Treatment sheet.

If programs wish to monitor and document the inventory of a weekly pill dispenser, if used by the consumer in the process of learning to self-medicate, certified staff may do so by placing his/her initials in the appropriate space on an observation sheet or by making note in a progress note.

Some individuals may find a daily calendar or check-off sheet helpful in keeping track of their own medications. This can also serve as documentation during the training process.

The progress of the training program will be documented on a data collection sheet and in quarterly review notes.

The Service Coordinator and Program Director, in consultation with the individual's health care provider, will decide when an individual is reliably self-medicating as described in the ISP/PSTP. A 6-month training period with close supervision is recommended with weekly pill counts for another 3 months.

After this time, the individual's should be reviewed at least at 3-month periods. An individual's completion will be recorded on the Self-Medication Assessment form. At any point, an individual who has decompensated may go back to an earlier time in the training process. It is recommended that a written plan be completed for all self-medicating individuals detailing needed supports, oversight required and the plan to follow if the individual becomes unable to safely self-medicate for some reason.

If an individual who does not usually take daily medication is put on medication for a short period of time (such as an antibiotic), that individual will not be considered self-medicating and will be monitored by staff. If a medication is ordered long-term, a formal training plan will be developed to help the individual learn the necessary self-medication skills.

DOCUMENTATION of Self-Medication Teaching would include the following:

- Appropriate documentation by certified or licensed staff in a progress note, on an observation sheet, or on a Medication and Treatment sheet that clearly identifies the specific role of the staff in the process of learning to self-medicate.
- Documentation by an individual consumer on a calendar with large boxes is acceptable—(the medication names, dosage and times should be written accurately by a staff member).
- Assessment of Self-Medication Skills.
- •ISP/PSTP goals or teaching plan and date sheets).
- Documentation of the supports needed for the person to continue to be self-medicating including the plan for monitoring accuracy of self-medication and plan to follow if the person becomes unable to safely self-medicate, Documentation of the supports needed for the person to continue to be self-medicating including the plan for monitoring accuracy of self-medication and plan to follow if the person becomes unable to safely self-medicate.

POLICY ISSUE: Sample Self-Medication POLICY NO: 07-7

Teaching Plan

POLICY SOURCE: Supervisor's Training Manual DATE ISSUED: 5/15/98

SEE FORM ON FOLLOWING PAGE

SAMPLE

SELF-MEDICATION TEACHING PLAN FOR:DATE:DATE:	
GOAL: Self-medication: (specify what that will mean for this individual):	
Medication Administration skills to be addressed (Take from Assessment of Self-Medication Skills)	
Learning Objective:	
Teaching Plan/Documentation:	

POLICY ISSUE: Sample Self-Medication POLICY NO: 07-8

Support Plan

POLICY SOURCE: Supervisor's Training Manual DATE ISSUED: 5/15/98

SEE FORM ON FOLLOWING PAGE

SAMPLE SELF-MEDICATION SUPPORT PLAN

DATE: ASSESSMENT OF SELF-MEDICATION SKILLS COMPLETED Individual must demonstrate competence in all* areas in order to be considered self-medicating.	NAME:	
Individual must demonstrate competence in all* areas in order to be considered self-medicating. SUPPORTS NEEDED: Takes pills from pill bottles Weekly pill container Medication chart-individual puts check on chart or calendar when medication is taken. Prompts needed In person: when Aids:timer, watch etc. Other HOW IS SELF-ADMINISTRATION OF MEDICATION MONITORED? Observe each time medication is taken Check of weekly pill container Periodic pill count Review of individual's medication chart or calendar Other WHAT SYSTEM WILL BE USED IF THE INDIVIDUAL IS UNABLE TO ACCURATELY SELF-MEDICATE FOR A TIME? Staff will administer medication from labeled bottles or cards Weekly pill container will be checked (Note how often) Describe plan to help individual regain independence in self-medication:	DATE:	
Takes pills from pill bottles Weekly pill container Medication chart-individual puts check on chart or calendar when medication is taken. Prompts needed In person: when		
Observe each time medication is taken Check of weekly pill container Periodic pill count Review of individual's medication chart or calendar Other WHAT SYSTEM WILL BE USED IF THE INDIVIDUAL IS UNABLE TO ACCURATELY SELF-MEDICATE FOR A TIME? Staff will administer medication from labeled bottles or cards Weekly pill container will be checked (Note how often) Other Describe plan to help individual regain independence in self-medication:	Weekly pill container Medication chart-individual puts check on chart Prompts needed In person: when Aids:timer, watch etc.	
Staff will administer medication from labeled bottles or cards Weekly pill container will be checked (Note how often) Other Describe plan to help individual regain independence in self-medication:	Observe each time medication i Check of weekly pill container Periodic pill count Review of individual's medication	s taken
Staff will administer medication from labeled bottles or cards Weekly pill container will be checked (Note how often) Other Describe plan to help individual regain independence in self-medication:		
Weekly pill container will be checked (Note how often) Other Describe plan to help individual regain independence in self-medication:		TDUAL IS UNABLE TO ACCURATELY
	Weekly pill container will be checked (Note how	w often)
Individual Date	Describe plan to help individual regain independent	endence in self-medication:
Individual Date		
	Individual	 Date

DCP 99 MAP POLICY 01.doc MAP Policy Manual 9/1/98

Case Manager	Program Director

08

MEDICATION OF MINORS

POLICY ISSUE: Administration to Minors POLICY NO: 08-1

POLICY SOURCE: April 1997 MAP Advisory DATE ISSUED: 04/97

DPH regulations at 105 CMR 700.003 implementing MAP refer to medication administration by certified staff to adult clients/consumers. The regulations do not set the criteria for medication administration to individuals under the age of 18 years of age. Direct care staff are not trained nor certified under MAP to administer medications to individuals under the age of 18 years.

09

MEDICATION OCCURENCES

POLICY ISSUE: Definition of Medication Occurrence POLICY NO: 09-1

POLICY SOURCE: October 1996 MAP Advisory DATE ISSUED: 10/96

- For the purpose of reporting, a medication occurrence is defined as an event that results from a breach of one of the five "R's", namely right individual, right medication, right time, right dose and right route. There are five types of reportable occurrences --"the five wrongs" are listed on the reporting form: wrong individual, wrong medication (which includes administering a medication without an order), wrong time (which includes a forgotten dose), wrong dose and wrong route. (Refer to the Training Manual, Chapter 3).
- The definition of "right time" has been clarified to include medications administered "within the appropriate time frame". This permits a consultant designated by the program to help determine if an occurrence has taken place by using the practitioner's prescription as his/her guide and to recommend an intervention if needed. The determination of whether an occurrence has taken place is the responsibility of the program in conjunction with the consultant, and is based upon the practitioner's prescription, not solely upon the program's or site's medication schedule. For example, a medication ordered BID is not necessarily a reportable occurrence if it is given at 8A.M. and 8P.M. rather than at the times of 8A.M. and 5P.M. scheduled by site staff.
- Events that are not within the staff's control, such as medications missed due to an individual's refusal or absence, no longer require reporting via an MOR. Nevertheless, service providers should have internal reporting procedures for refusals and similar events in order to maintain appropriate care and quality assurance standards. This change will result in an estimated 60% to 70% reduction in occurrences that are deemed reportable.

POLICY ISSUE: Use of MAP Consultant POLICY NO: 09-2

POLICY SOURCE: October 1996 MAP Advisory DATE ISSUED: 10/96

April 1997 MAP Advisory DATE ISSUED: 4/97

A Professional Consultant (registered nurse, registered pharmacist or licensed practitioner) Must be Contacted Whenever There is a Medication Occurrence.

- Regulations at 105 CMR 700.003(F)(1)(f) define the professional consultant as a registered nurse, registered pharmacist or licensed practitioner. Licensed practitioner is defined in the regulations as a physician, dentist, podiatrist, or other person (eg.nurse practitioner, psychiatric nurse clinician, midwife) who is registered to prescribe controlled substances in the course of professional practice.
- A professional consultant must be available to direct care staff 24 hours a day, seven (7) days per week.
- Professional consultants must be contacted for every medication occurrence. The consultant will help the staff determine if an event is a medication occurrence based upon the practitioner's prescription; will assess if harm may have been incurred by the consumer/client; and will recommend to staff the appropriate medical intervention, if any, to be taken.
- Professional consultants shall 1) provide staff with the technical assistance they require to interpret the practitioner's prescription; 2) recommend appropriate action(s) to follow a medication occurrence; and 3) provide the staff with guidance regarding the reporting process should they require it.
- The DPH registrant (the service provider) has the responsibility to determine whether or not there has been an occurrence; to determine what, if any, action(s) will be taken by staff to care for the client/consumer; and to report to DPH/DMH/DMR within the established time frames.

POLICY ISSUE: Requirements for Reporting POLICY NO: 09-3

POLICY SOURCE: October 1996 MAP Advisory DATE ISSUED: 10/96

- An MOR must be filed on any reportable medication occurrence. Those occurrences that are
 followed by a medical intervention, illness, injury or death are reportable directly to DPH via
 telephone or fax within 24 hours of the occurrence. Copies of all MOR's must be forwarded within
 seven (7) days to your DMH/DMR Area/Regional MAP Coordinator.
- While service providers are no longer required to collect and collate reportable medication
 occurrence data and forward the data to DMH/DMR, it is strongly recommended that internal
 reporting procedures remain in place to identify and address problem areas, thereby maintaining
 appropriate care and quality assurance standards.
- DPH will inform DMH/DMR of those medication occurrences reported directly to DPH.
 DMH/DMR will forward statistical reports on medication occurrences and copies of all MOR's to DPH on a monthly basis. DPH/DMH/DMR will routinely review all reports to screen for those that require further inquiry.

POLICY ISSUE: Medical Intervention POLICY NO: 09-4

POLICY SOURCE: April 1997 MAP Advisory DATE ISSUED: 4/97

Recommended Action(s)/Medical Intervention(s) does not include contacting the consultant nor
does it include adjustments made to the medication regime (e.g. skipping the missed dose and
administering next dose as scheduled.). These should be marked as "none" in the recommended
action(s) section of the MOR form. However, medical intervention does include medical care
provided to the client/consumer (e.g. lab work, a visit to the doctor, clinic, hospital, emergency
room).

POLICY ISSUE: Medication Occurrence POLICY NO: 09-5

Reporting (MOR) Form

POLICY SOURCE: October 1996 MAP Advisory DATE ISSUED: 10/96

• The new reporting form (MOR) requests information in a manner that reduces the paperwork burden on service providers and facilitates tracking and review by state agencies. The form is user friendly requiring no narrative statement from direct care staff and minimal narrative notes from the supervisor. The form is designed to facilitate appropriate reporting, allow the collection of relevant information and improve the ability to track and respond to medication occurrences. Direct care staff completing the form do not need to sign their name nor state the staff person involved in the occurrence. The responsibility lies with the supervisor to review the occurrence, check off contributing factors (if any), comment (optional) and forward a copy of the MOR to the appropriate agency within the assigned time frames. Original forms remain at the site.

• A medication occurrence report is only used for an error by certified staff administering medications and therefore does not need to be completed for self-medicating individuals.

POLICY ISSUE: Instructions for Completion of POLICY NO: 09-6

MOR Form

POLICY SOURCE: October 1996 MAP Advisory DATE ISSUED: 10/96

1. The MOR form must be complete! Fill in all areas before the MOR is faxed to DPH or forwarded to DMR/DMH. Incomplete forms will be returned. Keep original MOR's at the site.

- 2. Complete the MOR after the consumer/client's immediate needs for care or medical intervention have been met.
- 3. The first section requests basic information that permits DPH/DMH/DMR to identify the agency, site and consumer/client. Please include the site's telephone number with area code and your DPH registration number since these numbers will be used by DPH/DMH/DMR as identifiers for tracking purposes.
- 4. To complete the "Type of Occurrence" section, check the occurrence that has taken place. If staff are unsure whether an event is reportable or what type of occurrence should be checked, staff should clarify this with the consultant when the consultant is contacted.
- 5. List the medications involved in the occurrence in the "Medication(s) Involved" section. Write the medication ordered by the practitioner next to "As ordered". Write the exact medication, dose, frequency/time, and route by which the medication was actually given to the consumer/client next to "As Given". The section allows room for three medications to be listed. List additional medications on the reverse side of the MOR using the "As Ordered/As Given" format.
- 6. Under the "Consultant Contacted" section document the type of professional consultant contacted, the consultant's name, the date and time contacted, whether the consultant recommended an action/medical intervention and what action/medical intervention, if any, the consultant recommended.
- 7. If no medical intervention, illness, injury or death follows the occurrence, check "No" in the appropriate section. The supervisor should then review the MOR and comment if needed. Forward a signed and dated copy of the MOR to your DMH/DMR Area/Regional MAP Coordinator within seven (7) days. A list of DMH/DMR MAP Coordinators with addresses are provided on the reverse side of the MOR.
- 8. If a medical intervention, illness. injury or death follows the occurrence, check "Yes" in the appropriate section and indicate the type of event. The supervisor should then review the MOR

- and comment if needed. Notify DPH within 24 hours of the medication occurrence by telephone and/or fax (faxing is encouraged whenever possible). Forward a signed and dated copy of the MOR to your DMH/DMR Area/Regional MAP Coordinator within seven (7) days.
- 9. For the purpose of reporting, medical interventions include, but are not limited to, treatment in an emergency room, clinic or other health care facility; treatment by a health care provider; and/or, lab work or other tests. Since contact with the professional consultant is standard protocol for all medication occurrences, such consultation in and of itself would not constitute a medical intervention for the purposes of the reporting requirement.
- 10. The last section on the MOR lists the most common factors that contribute to medication occurrences. The site supervisor should review the factors involved in the occurrence and check all those that apply. If no contributing factors are involved, then "(g) none" should be checked. The supervisor may comment as he/she deems necessary and appropriate. Additional space is available on the reverse side. The supervisor must enter his/her signature, title and date on the MOR.

POLICY ISSUE Approved MOR Form POLICY NO: 09-7

POLICY SOURCE: October 1996 MAP Advisory DATE ISSUED: 10/96

SEE FORM ON THE FOLLOWING PAGE

Department of Public Health

Medication Administration Program

MEDICATION OCCURRENCE REPORT

Agency Name:	Name: (Consumer/Client) Last First
Site Address:	D. 4. //T.
Street	Site Telephone Number()
	DPH Registration Number
City/Town Zip Code	
	TYPE of OCCURRENCE:
·	per regulation, contact consultant.)
(1)Wrong Individual	(4)Wrong Dose
(2)Wrong Medication (includes medication (3)Wrong Time (includes a "forgotten "dose"	• • • • • • • • • • • • • • • • • • • •
viong inite (includes a Torgotten "dose)
T.	MEDICATION(S) INVOLVED:
Name:	Dosage: Frequency/Time: Route:
As Ordered:	• •
As Given:	
As Ordered:	
As Given:	
As Given:	
	CONSULTANT CONTACTED
	se Registered Pharmacist Licensed Practitioner
	Date Contacted:Time Contacted:
*****	First
Recommended Action (Medical Intervention) _	YesNo
If Yes, check all those that apply: (1) Lab Work or Other Tests (2) Physician	Visit (3)Clinic Visit (4)Emergency Room Visit (5)Hospitalization
(6) Other (de scribe)	
Did medical intervention. illness	s, injury or death follow the Occurrence?No
	FAX (617) 524-8062 within 24 hours. For ALL Occurrences,
	/DMR MAP Coordinator within 7 days. (See reverse side for
addresses.)	, 21.222 1.222 Cool Gillian William / Ways (See 1evelse side 101
	Supervisory Review/Follow-up
Contributing Factors: Check all that apply. If no	<u> </u>
(a) Polle of A and B and	on Onlan
(a)Failure to Accurately Record and/or Transcribe a (b)Failure to Properly Document Administration	an Order (d)Medication Had Been Discontinued (e)Improperly Labeled by Pharmacy
(c)Medication Administered by Non-Certified Staff (
instances where certification has expired or has b	=

side).		(If additional sp	ace is required, please use reverse
		Signature/Title:	Print
		Name:	Date:
0/30/96	Occurrence Reporting is require	red by regulation at 105C	MR 700.003(F)(1)(f).
MAP9705.DOC	Consultant Contact is required	by regulation at 105CMF	R 700.003(F)(1)(g).

DMH MAP COORDINATORS	DMR MAP COORDINATORS	
Roe Kaparis	Charles Streciwilk	
Western Mass Area Office	Region I/Western Mass	
Northampton State Hospital	Commonwealth Community Services	
PO Box 389	One Roundhouse Plaza	
Northampton,MA 01061	Northampton, MA 01060	
Marie Rice-Brunelle	Dorothea Frederico	
Central Mass Area Office	Region II/Central	
Worcester State Hospital 305 Belmont Street Worcester,	Glavin Regional Center	
MA 01604	214 Lake Street	
	Shrewsbury, MA 01545	
Barbara Mackey	Joan Dawkins	
North East Area Office	Region III/Northeast	
PO Box 387	Hogan Berry Regional Center	
Tewksbury, MA 01876-0387	PO Box A	
	Hathorne, MA 01937	
Rick Robillard	Jeanne Reed	
Emery House	Region V/Southeast	
5 Chambers Road	DMR Region V	
Taunton, MA 02780-2486	68 North Main Street	
	Carver, MA 02330	
Carol O'Rourke	Josephine Morrell	
Metro West Area Office	Region VI/Metro Area	
Westborough State Hospital	DMR Harbor	
PO Box 288 Lymann Street	66 Canal Street	
Westborough, MA 01581	Boston, MA 02114	
Judyann Barkus		
Metro Boston Area Office		
20 Vining Street		
Boston, MA 02115		
Daniel Lynn, ADON		
Community Programs		
Medfield State Hospital		
45 Hospital Road		
Medfield, MA 02052		

ADDITIONAL		
SPACE:	 	

10

MEDICATION SECURITY AND RECORD KEEPING

POLICY ISSUE: Administrative Policies POLICY NO: 10-1

& Procedures

POLICY SOURCE: December 1994 MAP Advisory DATE ISSUED: 12/94

- All program sites shall have on file a master list of all certified staff members' certifications with dates of expiration and/or copies of staff certificates.
- All program sites must have on file up-to-date client-specific medication records
- Each site must also have a copy of the following:
 - it's agency's: list of approved consultants;
 - policies and procedures related to access to consultants;
 - policies and procedures for medical emergencies related to medication administration;
 - approved medication occurrence reporting forms;
 - LOA policy;
 - written policies for obtaining properly labeled medication containers;
 - policies for identifying and educating individuals responsible for off-site medication administration;
 - policy on access to the medication area; and
 - medication-specific resource material containing, at a minimum, information
 on the specific medications being administered on site (e.g. Physician's Desk
 Reference).

POLICY ISSUE: Medication Security POLICY NO: 10-2

POLICY SOURCE: December 1994 MAP Advisory

1995 DMR Memorandum DATE ISSUED: 9/12/95

DATE ISSUED: 12/94

- Each program site must have a specific area dedicated to the storage of all Schedule II-VI prescription medications and OTC medications.
- Each program site must have procedures that limit the day-to-day access to this area to the
 individual authorized to administer medications during each shift and that limit possession of the key
 to the medication area to the authorized staff on that shift.
- Each program site must have procedures that provide that only one duplicate key to the medication area should exist and that the key should be in the possession of agency administrative staff.
- To limit the number of medication keys, the key should be stored in a locked area within the house accessible to designated staff only.
- The key should be replaced in the locked area after completion of the shift or personally given to the staff person assigned to administer medications on the incoming shift.
- The individual administering medications should keep the key on person during the assigned shift. If they need to leave the residence it should be placed in a secure place.
- Each individual program should have available a back-up key that is kept in a separate locked location. The knowledge of this location shall be restricted to the Program Director and Residential Supervisor.
- If at any time the medication key is lost or misplaced the appropriate administrative staff must be notified immediately.
- Each program site must utilize a bound medication count book for recording Schedule II-V medication administration and change-of-shift accounting of medications.

POLICY ISSUE: Schedules II - V POLICY NO: 10-3

POLICY SOURCE: December 1994 MAP Advisory DATE ISSUED: 12/94

1995 DMR Memorandum DATE ISSUED: 9/12/95

- Medication counts are to be conducted by two licensed and/or certified staff whenever control of the medication key is passed.
- A count must always occur at the start and end of each shift.
- DPH recognizes that there are some situations where two licensed and/or certified staff are not available at every change of shift. In those instances it is recommended that the single licensed/certified staff person coming on or off shift conduct a count and sign the medication count book. At the first opportunity for a two person count, the count must be conducted.
- Under no circumstances should a two person count be conducted less than once every twenty-four hours.
- All Schedule II V medications must be doubled locked, i.e. locked box within a locked cabinet.
- In addition to contacting the Residential Supervisor and/or on call person, any discrepancy noted in the count should be reported to the Department of Public Health at (617) 983-6700 on the next business day after the discovery of the discrepancy.
- The count sheets must be maintained in a bound book within the medication administration area. (These books may be obtained from a commercial manufacturer or other bound books [i.e., composition books] may be used.)
- All Schedule II V medications should be marked as such by the pharmacy.

POLICY ISSUE: Storage & Labeling POLICY NO: 10-4

POLICY SOURCE: 1995 DMR Memorandum DATE ISSUED: 09/12/95

- Prescription and non-prescription (OTC over the counter) medications for all individuals who are
 non self-medicating shall be labeled and stored in a locked container or area which is devoted
 strictly for medication storage, supplies, and records <u>relevant to medication administration</u>. (Policy
 books or other supplies are not to be stored in the area.)
- External and internal medications are to be stored separately (i.e., different shelf).
- Prescription medication requiring refrigeration must be stored in a locked container within the refrigerator on site, if necessary, or in a separate (locked) refrigerator.
- Only Certified staff (those who have successfully completed the Medication Administration Training)
 are to be assigned the duty of administering medications for their assigned shift These people shall
 have access to the storage areas.
- Staff shall not repack or relabel any medications when medication is given at two different locations. (Except for unanticipated leaves of absence of less than 72 hours.)
- If consumer receives medication at two different site,s a separate labeled prescription bottle or bubble pack will be obtained from the pharmacy for use at each separate site. The documentation for administration will remain the same at both sites. The medication administration record will be kept for the 30 day period or sooner and returned to the residence. The residence will remain responsible for notifying the off site program of any medication changes and for supplying the necessary forms.
- The program shall not store on-site more than a thirty-seven (37) day supply of any medication.
- The program must maintain a record of when a prescription is filled and the quantity of medication dispensed by the pharmacy.
- Any illegible, worn or missing labels should be referred to the pharmacy for replacement or issuance of new medication.

POLICY ISSUE: Disposal POLICY NO: 10-5

POLICY SOURCE: April 1997 MAP Advisory DATE ISSUED: 4/97

- All unused or discontinued medications must be destroyed on site or at the service provider's office.
 Medications are not permitted to be returned to the pharmacy for disposal.
- According to regulations at 105 CMR 700.003(f)(3)(c): "disposal occurs in the presence of at least two witnesses and in accordance with any policies at the Department of Public Health". DPH requires that disposal occur in the presence of two certified/licensed staff of which one of the two is supervisory staff.
- Whenever medications are destroyed, regardless of the quantity, the DPH approved medication disposal record must be used.
- Disposal must render the medications useless and must be in accordance with acceptable DPH
 disposal practices. Unless prohibited by local ordinance, acceptable practices include, but are not
 limited to, incineration at an approved site, flushing, melting the medication in boiling water, crushing
 the medication into fine dust and mixing with bleach.
- All medications returned to the program site, whether from LOA's, hospitalizations, Detox Centers, or other sources, must be destroyed as per DPH regulation. They cannot be reused by the program.
- Although the DPH approved disposal form only mentions Schedule II through V medications, it may be used for all medications.

POLICY ISSUE: Packaging of Prescription POLICY NO: 10-6

Medications

POLICY SOURCE: April 1997 MAP Advisory DATE ISSUED: 4/97

• Department of Public Health policy requires that all Schedule II-V (Countable Substances) medications shall dispensed to, and maintained by the community program, in "blister" packs, "Bingo" cards, cassettes or other similar tamper-resistant packages. [105 CMR 700.005(A)]

- The current MAP inspection form utilized by DPH requires that: "all countable substances are received from pharmacy in tamper-resistant containers" (see Item #11) as defined above and that if found in violation, the program shall correct the violation "Immediately". Recognizing that an immediate correction timeline may present difficulties for vendors and sites, DPH is modifying its correction time-frame to allow 30 days in which sites are expected to be in compliance.
- Multiple medications may not be packaged in one "window", "bubble", "cartridge", or other section of the above described tamper-resistant packages. Each type of medication should be in its own package and clearly labeled. Each individual dose should be in its own "window", "bubble", "cartridge" or other section. (105 CMR 700.005(A)
- Splitting, cutting or breaking of a tablet, pill or capsule is prohibited. All medication must be
 dispensed by the pharmacy in such a manner that it is ready for administration. For Schedules II-V,
 this means that the dosage ordered (e.g. a half tablet) should be packaged as such in the tamperresistant packages described above.

POLICY ISSUE: Packaging by Pharmacist POLICY NO: 10-7

POLICY SOURCE: April 1997 MAP Advisory DATE ISSUED: 4/97

• A pharmacist can prepare medications in seven day planners or cassettes. Please note that there are specific federal regulations that the pharmacist must follow for this type of packaging.

POLICY ISSUE: Drug Losses POLICY NO: 10-8

POLICY SOURCE: DPH Policy DATE ISSUED: 9/1/98

- In the state of Massachusetts, controlled substances include all prescription medications (Schedules II VI). However, regulations require that only those prescription medications in Schedules II V (e.g. narcotics, stimulants) be reconciled as described in section 10-2 of this manual.
- To comply with state regulations, drug losses for **all** prescription medications (Schedules II-VI) must be reported to DPH.
- Because medication losses are **not** medication occurrences, they should not to be called into the Medication Occurrence Hotline. Rather medication losses must be called into the Drug Control Program at DPH at (617)983-6700 by the first business day after discovery. [105 CMR 700.003(F)(1)(E)] Normal business hours are Monday through Friday 8:45 AM to 5:00 PM.

POLICY ISSUE: Disposal Form POLICY NO: 10-9

POLICY SOURCE: April 1997 MAP Advisory DATE ISSUED: 4/97

SEE FORM ON THE FOLLOWING PAGE

CONTROLLED SUBSTANCE DISPOSAL RECORD

Agency	Program	DPH registration #
Item #	Date last filled	Item # Date last filled
Name	Date	Name Date
Medication/strengt	th	Medication/strength
		RX# Pharmacy
RX#	Pharmacy	Amount Disposed Reason
Amount Disposed	Reason	
		Control. Substance Book # (countables) Page #
_		Signatures: 1. Staff
Control. Substance	Book # (countables) Page #	2. Supervisor
Signatures: 1. Sta	nff	
2. Sup	ervisor	
Item #	Date last filled	Item # Date last filled
Name	Date	Name Date
Medication/strengt	th	Medication/strength
		RX# Pharmacy
RX#	Pharmacy	Amount Disposed Reason
Amount Disposed	Reason	
		Control. Substance Book # (countables) Page #
_		Signatures: 1. Staff
Control. Substance	Book # (countables) Page #	2. Supervisor
Signatures: 1. Sta	nff	
2. Sup	ervisor	
Item #	Date last filled	Item # Date last filled
	 Date	Name Date
Medication/strengt		Medication/strength
· ·		RX#Pharmacy
	Pharmacy	
	Reason	
_		Signatures: 1. Staff
Control. Substance	Book # (countables) Page #	
Signatures: 1. Sta	nff	
2. Sup	ervisor	

Destruction of all prescription medications in Schedules ll-V that are either outdated, spoiled or have not been administered due to a change in the prescription or a stop order shall be documented on the DPH approved disposal record. According to regulations at 105CMR~700.003(f)(3): "disposal occurs in the presence of at least two witnesses and in accordance with any policies at the Department of Public Health". DPH policy requires disposal to occur in the presence of two certified or licensed staff of which one of

the two is supervisory staff. Failure to maintain complete and accurate records of drug destruction could result in revocation of your Controlled Substance Registration. Disposal must render the medication useless and must be in accordance with acceptable DPH disposal practices. Unless prohibited by local ordinance, acceptable practices include, but are not limited to, incineration at an approved site, flushing, melting the medication in boiling water, crushing the medication into fine dust and mixing with bleach. Medications are not permitted to be returned to the pharmacy for destruction.

All medications returned to the program site, whether from LOA's, hospitalization, Detox Center, or other sources, must be destroyed as per DPH regulation. They cannot be reused by the program.

11

LEAVES OF ABSENCE

POLICY ISSUE: Leaves of Absence Policy POLICY NO: 11-1

POLICY SOURCE: December 1994 MAP Advisory

April 1997 MAP Advisory DATE ISSUED: 4/97 1997 DMH Memorandum DATE ISSUED: 8/14/97

DATE ISSUED: 12/94

Leaves of Absence (LOA)

Leaves of absence often require that a client receive only a portion of the originally dispensed medication. While the re-packaging of client medications is not encouraged, there are certain circumstances where it is permissible. The DPH recommends that whenever possible a pharmacist should be responsible for repackaging or "split-packaging" prescription medications. Split-packaging is a service that most pharmacies provide. For example:

- If a client/consumer routinely requires medication administration at more than one location (e.g. at his/her day program and residence or at a relative's home on weekends) the pharmacist should be asked to split the medication into two tamper-resistant packages, one for the day program or home consumption and one for the residence (Note: the day program must have certified staff and possess a Controlled Substances Registration. For home visits, the responsible family member should receive some training on administration and potential side effects)
- If a client/consumer will be away from their residence for a period of up to 72 hours; will not be under the staff's direct supervision; and the pharmacist is unable to prepare the medications, certified and licensed may prepare the medications for the LOA. (See section 11-2 for "Preparation of Medications for LOA".)
- All routine absences of less than 72 hours and all extended absences of greater than 72 hours require preparation of the medications by a pharmacist.
- Under no other circumstances does DPH permit the packaging of medications by certified or licensed staff.
- Unless a client/consumer is learning to self-medicate and meets all of the criteria and requirements noted in section seven (7) of this manual, he/she is not permitted to package his/her own medication.

POLICY ISSUE: Preparation of Medications POLICY NO: 11-2

for LOA

POLICY SOURCE: December 1994 MAP Advisory DATE ISSUED: 12/23/94

April 1997 MAP Advisory DATE ISSUED: 4/97

 Packaging in tamper-resistant containers is not necessary for LOA Schedules II -V medications, however, as with all medications, only the exact number of doses necessary for the LOA may be repackaged.

- Consumers are not permitted to package medications under the LOA Policy. According to the DPH Advisory dated 4/15/97, the LOA Policy may not be used to cover the prepouring of medications for the purpose of training consumers in self medication. (See Learning to Self-Medicate, Section 07-2)
- Unused LOA medications cannot be returned to the program for reuse. Certified and/or licensed staff must dispose of these medications as per DPH regulation.
- Medications for all routine absences of less than 72 hours and all extended absences of greater than 72 hours must be prepared by a pharmacist.
- For unplanned absences of less than 72 hours, medications may be prepared by certified or licensed staff. Staff must follow the following procedure:
 - 1. Use an appropriate sized container so that the required information can be put directly on the container (ask your pharmacist for a supply of containers and blank labels without the pharmacy name and/or directions.)
 - 2. Whenever possible, use a tamper-resistant container.
 - 3. The amount of medication needed for the LOA should be determined and transferred from the original card or container directly into the LOA container.
 - 4. The LOA container should be marked with all the necessary information. This information should be taken directly from the original medication card or container and must include at least the following, in accordance with M.G.L. Chapter 94C, sec.22:
 - Client's/Consumer's name
 - Name and strength of medication
 - Directions for usage (clearly stated including specific doses & dosing times)
 - Prescribing practitioner's name
 - Date of dispensing
 - Any necessary cautionary statements (e.g. Take with food.)
 - Amount of medication in the LOA container

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5. A separate container must be used for each type of LOA medication.

POLICY ISSUE: Documentation of LOA POLICY NO: 11-3

POLICY SOURCE: December 1994 MAP Advisory DATE ISSUED: 12/23/94

April 1997 MAP Advisory
1997 DMH Memorandum
DATE ISSUED: 4/97
1995 DMR Memorandum
DATE ISSUED: 9/12/95

- When LOA medication is sent with a client/consumer, it must be noted as "LOA" on the individual's medication and treatment sheet.
- Also, any Schedule II V medications sent on the LOA must be accounted for in the medication count book.
- Any LOA medication brought back to the site by the client/consumer cannot be used. This medication must be destroyed and documented in the approved manner.
- The client/consumer and his/her responsible party must be provided with written instructions for the LOA medications and with copies of the medication information sheets. This should be noted in the client's/consumer' record.
- Included in the list of instructions is: who, what, where and how to call for technical assistance; preparation and other instructions; and special circumstances, if any, for omission of the medication.
- The above information is to be reviewed with all individuals who will be administering medication or if this is not possible, at least one of the individuals.

12

REFILLING PRESCRIPTIONS

POLICY ISSUE: Refilling Prescriptions POLICY NO: 12-1

POLICY SOURCE: April 1997 MAP Advisory DATE ISSUED: 04/97

• In MAP, prescription(s) may be refilled up to one week before the medication(s) runs out. If the consumer/client has Medicaid or other insurance coverage, the provider will need to follow the agency's or company's guidelines for the refilling of prescriptions.

13

PHYSICIAN ORDERS

POLICY ISSUE: Transcription of Health POLICY NO: 13-1

Care Provider's Orders

POLICY SOURCE: Policy Manual DATE ISSUED: 9/1/98

The Medication Occurrence Reporting System has shown that failure to accurately record and/or transcribe an order is the second leading contributing factor in medication occurrences in MAP. The breakdown in this important procedure is the leading cause for repeated occurrences. An improperly transcribed order may remain uncorrected over a long period of time resulting in increased risk of failure to manage the consumer's medical condition(s) as well as increased risk of adverse side effects. Even if these effects of improper medicating are reversible, which they usually are, improperly transcribed orders pose a significant risk for serious outcomes. For this reason, the Departments are revising the present curriculum and concentrating more training time on transcription of Health Care Provider's orders. In addition, the following established guidelines must be followed when transcribing an order:

- 1. The certified or licensed staff person who transcribes the order(s) must place a check mark in red, green or other readily distinguished color next to the order being transcribed. (The color should be designated by the service provider and is to be consistent throughout their sites.). This must be done for each and every order transcribed.
- 2. When all orders have been transcribed from the health care provider's order form to the Medication and Treatment Sheet, the certified or licensed staff must write "Posted", the date, the time and their name on the order form in the color designated by the service provider.
- 3. A second certified or licensed staff must review the orders that were transcribed by the first staff person and write "Verified", the date, the time and their name on the physician order form in the color designated by the service provider. If a second staff person is not scheduled when the orders are transcribed, then the next certified or licensed person on duty must follow the verification procedure described above and must review and verify the orders making the appropriate notation on the order form. The certified or licensed staff person who transcribes the order initially may, if a second staff person is unavailable, administer the ordered medications before verification is completed. However, the next certified or licensed person on duty must verify the orders immediately upon arrival at the site prior to administration of the medication(s).
- 4. All certified and licensed staff must compare any change in a medication order with the health care provider's order before administering the medication.

- 5. Any health care provider's order that is unclear or confusing must be called into the health care provider. The health care provider must explain the order to the staff before the order is transcribed and the medication is administered. In addition, written clarification must be obtained from the health care provider within seventy-two hours of the telephone verification.
- 6. In addition to the above, service providers must have a procedure for assuring that the health care providers' orders are reviewed on a regular basis and consistent with all medications being administered.

POLICY ISSUE: Documentation of HCP Orders POLICY NO: 13-2

POLICY SOURCE: 1995 DMR Memorandum DATE ISSUED: 9/12/95

- All medication orders must be written on some type of health care provider's order form. Only a licensed practitioner registered with the state of Massachusetts to prescribe can order medication. Each order must specify the following:
 - (a) time and date ordered, including the year
 - (b) name of the drug
 - (c) dosage
 - (d) route of administration
 - (e) frequency and duration of administration
 - (f) physicians signature
 - (g) pre-test medication orders must specify the period of time of
 - (h) pre-test administration, i.e. one hour before EEG
- All orders for medication shall be noted on a medication and treatment form and contain at least the following information:
 - (a) name and dosage of medication
 - (b) the time(s) the medication should be administered
 - (c) by what route the medication is given (oral, optic, rectal, etc.)
 - (d) if the medication is ordered for a set number of days the start and stop dates should be noted
 - (e) any special instructions for administration should be listed
- Any change in the medication order shall be considered a new order and documented as such on a medication and treatment form.
- All medications whether prescription or non-prescription (Over the counter [OTC]) shall be treated equally, that is:
 - (a) all medication needs a physician's order
 - (b) all medication is documented on a medication treatment form
- At any time when there is a change in orders (new drug, dose change, time change, etc.) this should be communicated to all staff verbally and a progress note should be written in the consumer's chart.

Pharmacy labels on the actual medication containers should be flagged by the approved method and the pharmacy contacted for a new label.
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- Monthly orders (computer generated or hand written) should undergo a quality check, i.e.,
 - (a) All orders should be compared to the previous month to ensure accuracy.
 - (b) The medication and treatment form should also be compared with the health care provider's orders and the pharmacy labels. (Health care provider's orders, transcriptions and pharmacy labels must all agree or medication may not be administered until orders are clarified.).
- If , for any reason, the medication is not administered as ordered, the reason why it was not given must be recorded on the medication treatment form (No Blank Spaces Are Acceptable).

POLICY ISSUE: TelephoneOrders POLICY NO: 13-3

POLICY SOURCE: 1995 DMR Memorandum DATE ISSUED: 9/12/95

December 1994 MAP Advisory DATE ISSUED: 12/23/94

Medication changes by telephone are allowed. When a telephone medication change is called in, staff should document the change in the individual's medication and treatment record. In addition, the person responsible for administering the medication should note clearly and boldly on the medication package that there is a new order and that the client's record should be checked. A change in medication orders does not necessarily require that the existing medication be destroyed. There are situations in which the existing medication can be used, either in higher or lower dosage or frequency of administration. Staff should contact the prescriber or their consultant or pharmacy to confirm whether or not the existing medication can be used or must be destroyed.

There will be occasions when a health care provider will provide a telephone order to a residence. If this occurs it is again treated as a new order and must be transcribed as such. In this circumstance the health are provider, in most cases, will call the pharmacy to notify them of the change in order (new drug, dosage change, change of route, etc.).

Additional documentation will be necessary if this takes place:

- The individual who obtains the order via the telephone will be responsible for transcribing the order.
- The new medication must be obtained from the pharmacy at the earliest convenient time.
- A physician's telephone order form must be filled out which will contain the following information.
 - (a) Address of residence
 - (b) Name of consumer
 - (c) Name of physician ordering changes
 - (d) Date of order
 - (e) Date of discontinuance
 - (f) Actual order and/or other instructions
 - (g) Signature of individual obtaining the order
 - (h) Time order received
 - After the order is obtained and all information is gathered the original form must be mailed out or faxed to the health care provider for his/her signature.

- (All telephone orders must be signed within 72 hours.)
- A copy should go to the pharmacist if necessary. If the physician has called the pharmacy with the order this may be discarded.
- A copy will remain in the consumer record until the original signed physician copy is obtained.
- Once the signed physician copy is returned the residence copy may be discarded.
- If at anytime there is a concern or question about the order or the process, the protocol for technical assistance should be initiated.
- The new order should also be documented in the consumers progress notes in addition to the staff log and/or communication book.
- A telephone order taken by direct care staff must be verified by a nurse before that
 <u>nurse may administer the medication</u>. As evidence, the nurse may use a
 pharmacy-labeled medication container/pack which complies with regulatory needs.
 This label is to be compared with the health care provider's order sheet for accuracy.
- The agency should also verify any and all telephone orders at the earliest convenient time in the interests of safety.

POLICY ISSUE: Exhausting Current Supply POLICY NO: 13-4

of Medication

POLICY SOURCE: 1997 DMH Memorandum DATE ISSUED: 04/25/97

A program should attempt to secure a properly labeled medication container from the pharmacy when the prescribing practitioner orders a change in a current medication. However, at times, due to pharmacy requirements and cost interests, it is acceptable to exhaust the current supply of the medication in question despite a change in dosage (or a change in the time of administration) provided **all** of the following four (4) criteria apply:

- 1. the prescribing practitioner supplies a new written order to the program that indicates on the new, changed order that the existing supply of medication may be exhausted;
- 2. the pill, capsule, or other vehicle is in a form which allows for "easy administration" of the new. changed order. i.e. the new dosage is an even multiple (up or down) of the medication on hand. Cutting or splitting of medication is not permitted. For example, an order for two (2) 10 mg. capsules BID of a medication could easily be administered if there was an increase to three (3) 10 mg. capsules TID or a decrease to one (1) 10 mg BID. However, it would not be possible, nor allowable, to use the existing supply of medication in this example if the order changed to one (1) 5 mg. capsule BID since cutting or splitting of the 10 mg capsule would be required;
- 3. the container has a brightly colored sticker affixed to it to alert the person administering the medication to the new, changed order; and,
- 4. the medication administration sheet (a) shows a stop of the old dosage and/or change in the time of administration and (b) is re-started to reflect the new, changed order.

POLICY ISSUE: Health Care Provider's Orders POLICY NO: 13-5

via FAX

POLICY SOURCE: Policy Manual DATE ISSUED: 9/1/98

• Faxed health care provider's orders are legal orders and, therefore, are acceptable by the Departments. In fact, the Departments strongly urge the use of fax orders in place of telephone orders.

POLICY ISSUE: Renewal of Health Care POLICY NO: 13-6

Provider's Orders

POLICY SOURCE: Policy manual DATE ISSUED: 9/1/98

• With the exception of DMH's requirement for the renewal of orders for psychotropic medications on a monthly basis, health care provider's orders, including standing orders, are valid for one year.

14

SPECIALIZED TRAINING PROGRAM

POLICY ISSUE: Training for Epinephrine POLICY NO: 14-1

Administration

POLICY SOURCE: Policy Manual DATE ISSUED: 9/1/98

Specialized Training Program Administration of Epinephrine via Auto-injector Device(s)

Direct care staff who have completed the Basic Medication Administration training, have current certification in CPR and First Aid, and are recommended by their program are eligible to participate in this training.

Training is consumer/client specific and may not be transferred from one consumer/client, site or program to another.

The training will consist of three parts:

- Didactic/Lecture: The DPH approved curriculum shall be used in a classroom setting for this part of the course. A brief written examination will be given at the completion of this session to test general knowledge regarding administration of epinephrine via auto-injector devices.
- Demonstration: This will be done within the classroom setting with the use of a manikin or
 an anatomically correct body part (leg). The trainer should demonstrate the procedure that
 the certified direct care staff will be trained to perform including the outlining of each step in
 the process from gathering the equipment to completion of the administration of epinephrine
 and required documentation.
- Redemonstration: The certified direct care staff to be trained should then demonstrate the
 process to the trainer. This must be done with 100% accuracy! Demonstration of the
 technique by the certified direct care staff must be done as many times as is necessary to
 assure competency with the administration. The determination of competency in
 epinephrine administration is solely the decision of the trainer.

For certified direct care staff caring for more than one consumer/client requiring administration of epinephrine via auto-injector device(s), additional training will be required **specific to each consumer/client.**

POLICY ISSUE: Documentation of Training POLICY NO: 14-2

POLICY SOURCE: Policy Manual DATE ISSUED: 9/1/98

The trainer must submit the following information to their area/regional MAP coordinator at the completion of the training:

- the names of individuals who have successfully completed the Specialized Training Program
- an application for Specialized Training in Epinephrine Administration completed by each participant
- all test materials including the written test results and skill checklist.

The MAP coordinator will then forward the information to the appropriate Central Office. The trainer will document in the consumer's/client's record which staff have been trained to administer epinephrine via auto-injector device(s).

POLICY ISSUE: Retraining for Epinephrine POLICY NO: 14-3

Administration

POLICY SOURCE: Policy Manual DATE ISSUED: 9/1/98

The trainer will provide retraining and review to certified staff who have received Specialized Training every six months. After the retraining and review sessions, staff with Specialized Training must repeat the return demonstration with 100% accuracy.

Successful completion of the return demonstration sessions will be documented by the trainer and maintained in the client's/consumer's record by the service provider.

Verification of the successful completion of the return demonstration shall be provided by the trainer on a DPH approved form to the specially trained staff who will submit the proof of successful completion to a tester at the time of recertification.

For recertification certified staff would complete only one application that will be inclusive of both the basic medication administration and for verification of the specialized training. Certified staff, therefore, would have only one expiration date for both basic certification and the specialized training.

Verification of all successful return demonstrations will be forwarded with the staff's application for recertification and recertification test results to the area/regional MAP coordinator who will forward this information to the appropriate Central Office.

As with basic certification, staff who have completed the Specialized Training Program may not administer epinephrine once their specialized training has expired.

Upon expiration of the specialized training, the staff person would have to retrain and retest before administering epinephrine.

POLICY ISSUE: Requirements for Trainers POLICY NO: 14-4

POLICY SOURCE: Policy Manual DATE ISSUED: 9/1/98

- All trainers must be approved trainers for the Basic Medication Administration Program.
- All trainers shall complete a Specialized Training Program Trainer's Session.
- All trainers must use the DPH approved specialized training manual. No deviation from the
 protocols and procedures set forth in the training manual is permitted. Any recommendations that a
 trainer may have regarding the training materials must be submitted for consideration to DMH/DMR
 before final approval by DPH.

15

DPH CLINICAL PRACTICE REVIEW AND INSPECTION

POLICY ISSUE: Clinical Practice Review & POLICY NO: 15-1

Inspection

POLICY SOURCE: DPH Policy DATE ISSUED: 10/27/97

For the purpose of evaluating the Medication Administration Program for its safety and effectiveness, DPH conducts both inspections and clinical practice reviews. The outcomes of these evaluations facilitate the determination of the areas of strength and weakness. This in turn allows the Departments to develop policy; revise the curriculum, training and testing; and to address specific concerns raised by the evaluations.

The inspection is specific to the security and accountability of controlled substances (prescription medications). The inspection of a site usually takes one to two hours.

The clinical practice review is also specific. It addresses clinical issues and practices specific to medication administration. The clinical practice review takes two to three days to complete depending upon the size of the service provider. The first day consists of a visit to the service provider's main office during which policies and procedures are reviewed and the sites to be visited are determined. The following days consist of review of the medication administration practices and systems at individual sites. The stay at each site varies depending on its size and complexity of the consumers' care. The review is completed with an exit interview with the service provider during which the findings and a corrective plan of action are discussed.

POLICY ISSUE: Clinical Review Process POLICY NO: 15-2

POLICY SOURCE: MAP Policy Manual DATE ISSUED: 8/1/00

The steps of the Department of Public Health's clinical review process for the Medication Administration Program may be summarized as follows:

- 1. Service providers are notified by DPH of the date and time scheduled for a clinical review.
- 2. The clinical review process is conducted at both the service provider's administrative office and at sites selected by DPH.
- 3. Following the clinical review, findings are reviewed with the service provider.
- 4. A copy of the clinical review findings is subsequently forwarded by DPH to the service provider and DMH or DMR.
- 5. The service provider is required to submit a plan of correction within 10 days to DPH and the appropriate licensing/certifying agency (i.e. DMH or DMR).
- 6. DMH or DMR, in consultation with DPH, conducts followup on the plan of correction.

Questions, concerns or problems regarding the clinical review process or findings should be directed to the DPH MAP Clinical Reviewer at (617) 983-6700 or addressed to the Drug Control Program, 305 South Street, Jamaica Plain, MA 02130.